

REPUBLIC OF UGANDA

Office of the Prime Minister



**STAKEHOLDER ENGAGEMENT PLAN**

**FOR**

**Fourth Northern Uganda Social Action Fund  
(NUSAF IV) Project (P179904)**

**February 2025**



## LIST OF ACRONYMS/ABBREVIATIONS

CEDAW	Convention on Elimination of all Forms of Discrimination Against Women
CITES	Convention on International Trade in Endangered Species
CoC	Code of Conduct
COVID	Corona Virus Disease
CSO	Civil Society Organization
DRDIP	Development Response to Displacement Impacts Project
EHS	Environment, Health, and Safety
EHSGs	Environmental, Health and Safety Guidelines
EIA	Environmental Impact Assessment
EISM	Enhanced Implementation Support and Monitoring.
ESCP	The Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMF	The Environmental and Social Management Framework
ESMP	The Environmental and Social Management Plan
ESS	Environmental and Social Standards
FGM/C	Female Genital Mutilation and Cutting
FPIC	Free Prior Informed Consent
GBV	Gender-Based Violence
GoU	Government of Uganda
GRCs	Grievance Resolution Committees
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Services of the World Bank
HIV/AIDS	Human Immuno-deficiency Virus/Acquired Immune Deficiency Syndrome
ILO	International Labour Organization
LIPW	Labor-Intensive Public Works
MDAs	Ministries, Departments and Agencies
MoES	Ministry of Education and Sports
MoFPED	Ministry of Finance, Planning and Economic Development
MoGLSD	Ministry of Gender, Labor and Social Development
MoLHUD	Ministry of Lands, Housing and Urban Development
MWE	Ministry of Water and Environment
NDP	National Development Plan
NEMA	National Environment Management Authority
NFA	National Forest Authority
NGO	Non-Government Organization
NSPP	National Social Protection Policy
OHS	Occupational Health and Safety
OPM	Office of the Prime Minister
PbMIS	Parish-Based Management Information System
PDM	Parish Development Model
PDO	Project Development Objective
PMT	Proxy Means Testing
PSC	Project Steering Committee

PSFU	Private Sector Foundation of Uganda
SEA	Sexual Exploitation and Abuse
SE	Stakeholder Engagement
SEF	Stakeholder Engagement Framework
(S)GBV	(Sexual and) Gender-Based Violence
(S)VAC	Sexual Violence Against Children
SEP	Stakeholder Engagement Plan
SOPs	Standard Operating Procedures
STAAC	Strengthening Transparency, Accountability and Anti-Corruption
STD	Sexually transmitted Disease
TB	Tuberculosis
TST	Technical Support Team
UBOS	Uganda Bureau of Statistics
UNDP	United Nations Development Programme
UNHCR	United Nations High Commission for Refugees
UNHS	Uganda National Household Survey
UPF	Uganda Police Force
UWA	Uganda Wildlife Authority
VAC	Violence Against Children
VMGF	Vulnerable and Marginalized Group Framework
VMGP	Vulnerable and Marginalized Groups Plan
VMGs	Vulnerable and Marginalized Groups
WB	World Bank
WFP	World Food Programme
YOP	Youth Opportunities Project



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## 1 Introduction

### 1.1 The Background

Uganda has made significant strides towards socioeconomic transformation over the last three decades, but the country's growth trajectory remains uncertain with stalled structural transformation and persistent poverty. Economic growth has levelled off with higher incidence of vulnerability to climate-related disasters and poverty, the impacts of overlapping global crisis such as the Corona Virus Disease (COVID-19) and high global food and fuel prices due to war in Ukraine. All sectors of economic activity have lowered their productivity levels,<sup>1</sup> which is also a reflection of a rapid population growth without adequate investment in its human capital. In fact, between 2005 and 2012, in absolute numbers, agricultural employment increased more than employment in other sectors and only started to slow from 2016. Uganda saw a much slower rate of structural transformation than neighbouring countries and no productivity gains were made through reallocation of workers across sectors. In addition, more recently GDP growth decelerated to around 5 percent per year during 2013–2019 and the economy contracted by 1.1 percent in 2020, in part due to the strict COVID-19 containment measures adopted by the Government of Uganda (GoU). The relaxation of COVID-19 containment measures in 2021 have resulted in improvements in consumption, public investment, and service delivery. However, recovery could be slower and more difficult, especially for poor and vulnerable households in the wake of unfolding global food, fuel, and financial crises.

Poverty remains high in Uganda, and according to the latest Uganda National Household Survey (UNHS), overall poverty in 2019/20 using revised poverty line (31.8 percent) was only slightly higher than poverty in 2016/17 (30.8 percent). Rising unemployment and work stoppages have pushed many Ugandans, especially women, back into subsistence agriculture, setting back achievement of the country's development goal of reducing the share of the population dependent on subsistence agriculture. The situation remains challenging to tackle poverty and vulnerability with the global food and fuel crises which has prompted a tightening of public investment and a drop in consumption.

Uganda hosts one of the youngest populations in the world, mostly rural and with high social and economic inequalities. Driven by a high fertility rate of 5.59 births (2018), Uganda's population has doubled to 42.86 million over the last two decades and is expected to reach 80 million by 2040. Uganda's Human Capital Index is 0.38, indicating that under current investments in human capital, the future earnings potential of children born today will be only 38 percent of what they could be with complete education and full health. Uganda's HCI outcomes are low throughout the life cycle. There are persistent disparities in poverty rates by location, with rural areas and the Northern and Eastern regions exhibiting the highest poverty rates. In 2019/20, the poverty rate in rural areas was 34 percent, much higher than the urban poverty rate of 20 percent. The highest poverty rates are observed in Acholi (67.5

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<sup>1</sup> The share of value added in agriculture fell from 33 to 26 percent, between 2005 and 2012, and further to 24 percent in 2019, while its employment share slightly declined from around 70 percent in 2011 to 64 percent in 2016 but then stalled around the same percentage in 2019 (pre-covid). Industry value added increased from 16 to 20 percent between 2005 and 2012, and to 26 percent in 2019, driven by manufacturing while its employment share increased from 5 percent in 2011 to 7 and 8 percentage respectively in 2016 and 2019, indicating stagnating productivity. The services value added initially increased from 51 to 54 percent and then decreased to 43 percent in 2019.



percent) and Karamoja (65.7 percent). Most rural households rely on subsistence agricultural activities, which are highly vulnerable to climate change impacts. Gender disparities are high in employment opportunities, outcomes and human capital development. For example, Gender disparities persist in the labor market: opportunities to access productive employment are lower for women, who are much more likely than men to be out of a job and out of school among others. The high frequency of shocks and their correlation with poverty is significant. According to the Uganda National Panel Survey (UNPS) data (2019/20), the share of households that experienced shocks during the last decade ranged from 30 percent to 40 percent, with rural and the poorest households most affected.

In relation to Sectoral and Institutional Context, the National Social Protection Policy (NSPP) that was adopted in November 2015 continues to guide the design and implementation of the social protection programs in the country. The provisions of the NSPP are linked to the National Development Plan III (2020) program area: 'human capital development', specifically focusing on gender and vulnerable communities. The design and coverage of social protection programs are currently insufficient to meaningfully address the range and scope of vulnerabilities to shocks in Uganda – this has been further exacerbated by the impact of the COVID-19 crisis. The levels of expenditure on social protection in Uganda are quite low, despite reasonable accuracy in targeting of the program beneficiaries. The social protection sector in Uganda faces the challenge around a lack of a national level system that is adaptive and could help in responding to shocks. More specifically, the gaps are (i) lack of a national dynamic social registry that is able to objectively identify poor and vulnerable groups across the country; (ii) lack of a robust and flexible payment system that would allow disbursement of timely payments; and (iii) absence of a comprehensive risk-financing mechanism at national level that would allow availability of predictable and timely resources for adequately responding to shocks.

The World Bank has supported the social protection sector since 2003<sup>2</sup> through financing of Northern Uganda Social Action Fund (NUSAF) – NUSAF 1, 2 and 3 phases. NUSAF has been one of the largest safety-net programs targeting households in the poorest and most vulnerable districts in Northern and Eastern Uganda. Under NUSAF 3, 67 districts were covered and benefited nearly 600,000 households (approx. 3 million persons). All three phases of NUSAF have focused on expanding safety nets, promoting sustainable livelihoods and building institutional capacity at the local level. In NUSAF 3 (P149965), support was provided to advance on systems strengthening through development of a beneficiary registry and disaster risk financing mechanisms. The NUSAF 3 Endline Assessment showed positive impact on poor and vulnerable households with: i) the percentage of households with savings increased from 54.6% to 70% during the operation's lifetime, ii) ownership of household assets increased significantly during the operation's lifetime i.e. livestock 45.6 % increase and equipment such as ox ploughs 16% increase, and iii) 3,460 community assets were built, increasing access to markets, agriculture commercialization and small infrastructure through Labor-Intensive Public Works (LIPW). Based on the Implementation Completion Report (ICR) for NUSAF3, the LIPW approach is useful to address vulnerability and poverty although operation and maintenance are key aspects to ensure

sustainability of LIPW community assets and will need to be strengthened in future interventions. The sustainable livelihood pilot - tapping on already existing community savings groups and mobilizing and supporting other poor households to form savings groups of their own - has proven to be effective to increase savings; and investing in mind-set change

The interventions of this proposed project will build on the lessons learned from previous phases and will be prepared through a consultative process by introducing innovations related to human capital development and economic inclusion and expanding the reach to national level of foundational delivery systems such as dynamic social registry. In addition, the proposed phase will scale-up the disaster risk financing mechanism. Furthermore, the Displacement Crisis Response Mechanism {under the WB financed Development Response to Displacement Impacts Project (DRDIP – P164101)} established an innovative mechanism, which pre-programs funds to rapidly respond to future displacement shocks.

Besides, the World Bank is providing support to the GoU under the ASA “Strengthening Social Protection Systems in Uganda” (P175018), financed through various multi-donor umbrella trust funds and will, among others, be expected to provide technical assistance in areas of development of a national social registry, scaling up digital payments and options for development of disaster risk financing mechanisms. The World Bank is also supporting the GoU in producing a “Human Capital and Growth Review”, which will help stimulate dialogue and inform policies to strengthen human capital for more inclusive growth in Uganda.

In terms of Relationship to CPF, the proposed project will contribute to the goals of the GoU’s NDP III covering 2020/2021 to 2024/2025 namely through regional affirmative action and human capital development. The project is also in line with the 2015 National Social Protection Policy (NSPP) by supporting its three objectives: (i) to increase access to social security; (ii) to enhance care, protection and support for vulnerable people; and (iii) to strengthen the institutional framework for social protection services. The project aligns with the new GoU’s Parish Development Model (PDM) objectives “to deepen the decentralization process; improve household incomes; enable inclusive, sustainable, balanced and equitable socio-economic transformation; and increase accountability at local levels”. The project especially contributes to the PDM pillars on financial inclusion, community mobilization and mindset change, and Parish-based Management Information System (PbMIS).

Following the World Bank Group’s communication ns with the enactment of the AHA, the Government of Uganda issued five Circulars (see Appendix 7). Of particular importance is the Circular on Uganda’s Social Safeguard Policies issued on September 21, 2023, by the Ministry of Finance, Planning and Economic Development, to all Accounting Officers, Ministries, Departments and Agencies and Local Governments which states that:

- “All World Bank-financed projects [in Uganda] must be implemented in a manner consistent with the principles of non-discrimination as provided under Article 21 of the Constitution of the Republic of Uganda. These projects should also be implemented in accordance with World Bank policies and applicable Legal Agreements.
- Under these projects, no one will be discriminated against or stigmatized, and the principles of nondiscrimination and inclusion will be adhered to. Support should be provided to all project beneficiaries.

- All implementing entities of World Bank [financed] projects will implement specific mitigation measures to address non-discrimination.
- These mitigation measures will require enhancing project grievance redress mechanisms as well as strengthening existing project monitoring by implementing entities including third-party monitoring [the Enhanced Implementation Support Mechanism] where applicable.
- Each project implementation entity shall develop comprehensive guidelines to address nondiscrimination.”

Considering this, further consultations were undertaken on nondiscrimination for the project environmental and social risk management documents including this ESMF to identify the additional risks and describes mitigation measures to address these risks. They include the implementation, monitoring, and reporting arrangements, and roles and responsibilities to assess the efficacy of the additional mitigation measures being implemented in some of the ongoing World Bank supported projects. They also include the risks identified in the public consultations on these documents involving the Government of Uganda and civil society organizations. Noteworthy is that the World Bank will provide support to the Government of Uganda, particularly its Project Implementation Units, to help them to implement the additional mitigation measures for this project.

## 1.2 Project Description and Scope

The project will primarily support interventions that promote institutionalization of social protection programs and development of a social protection system at the national level. The project interventions will support moving from a project-based approach to ‘program-based approach’ with interventions that promote sustainable livelihood for inclusive economic growth, resilience building of poor and vulnerable households to shocks and enhanced human capital development through setting-up pro-poor service delivery systems. The sustainable livelihoods investments will allow the beneficiary households to acquire business development, entrepreneurial, and soft skills along with productive income support to increase and diversify their incomes, accumulate assets and savings, and develop linkages to markets. The project will also strengthen institutional arrangements, invest in technical and managerial capacities, and operationalize technology enabled delivery systems to effectively deliver services to the targeted groups. The project will contribute to the development of social protection systems at the national level and support interventions that make the social protection delivery systems adaptive in times of shocks. The project is fully aligned with NDP III and will also ensure synergies and alignment with other key Government projects such as PDM. Key lessons that informed project design include the following:

- Integrated livelihoods approach that focused on community engagement, mindset change to promote savings and entrepreneurship, and supporting linkages to markets has proven to be an effective way to provide livelihood support to communities while ensuring sustainability.
- The use of LIPW is a useful approach to address vulnerability and poverty among the poorest households.
- A disaster risk financing mechanism needs to be developed in advance to ensure rapid flow of funds for a scale-up.

- The strengthening of social protection systems at the national level is critical to ensure a timely response to shocks due to external events, such as climate or other covariate shocks.
- Under NUSAF 3, allocating resources for enhanced accountability and anti-corruption demonstrated its effectiveness in engaging citizens as active participants in demanding for accountability and quality services in addition to controlling corruption.
- Enhanced engagement of women under NUSAF 3, resulted in increased participation in project management leadership, lower incidence of gender-based violence (GBV), increased access to better health services.
- The project design is also informed by the climate and disaster risk screening and contributes significantly to climate change adaptation.
- Furthermore, the project aims to be gender tagged by building on the NUSAF experience to close the gap on access of women to better economic opportunities given the gaps highlighted in the labor market.

### 1.2.1 Project Development Objective

The Project Development Objective (PDO) is to “support sustainable livelihoods, enhance the poor and vulnerable households’ resilience to shocks and strengthen shock-responsive social protection systems in Uganda” to improve the quality of life. **Tracking progress towards attainment of the PDO will be based on the following indicators:** Share of beneficiaries of livelihood support activities reporting increased income (percentage, sex disaggregated), Share of safety net beneficiaries who no longer use negative coping strategy (percentage, sex disaggregated), and number of districts covered by the National social registry where data of at least 75% of the targeted<sup>3</sup> households are collected and processed. Additionally, other indicators are being considered including for measuring intermediate results across all the project components.

### 1.2.2 Project Components

The project consists of the following 4 (four) components.

1. **Component 1: Sustainable Livelihoods Enhancement**  
 Sub-component 1.a Sustainable Livelihoods Enhancement in rural areas  
 Sub-component 1.b Youth Employment and Opportunities
2. **Component 2: Strengthening Safety Nets for Enhanced Resilience and Human Development.**  
 Subcomponent 2.1: Climate smart Labor-Intensive Public Works (CS LIPW) program.  
 Subcomponent 2.2: Gender and nutrition sensitive safety net.  
 Subcomponent 2.3: Shock-responsive LIPW.
3. **Component 3: Transformational Delivery Systems**
4. **Component 4: Program Management, Controls and Accountability**

These components are further described below:

#### Component (1) Sustainable Livelihoods Enhancement

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<sup>3</sup> Targeting will determine the coverage of districts and households in the social registry.

This component builds from the successes made under NUSAF3 and will continue supporting GoU in implementing customized economic and social inclusion activities addressing the needs of **poor and vulnerable households** in the subsistence economy (both in agriculture and in low-productivity services), especially in the Northern and Eastern Regions of Uganda. While economic and structural transformation is the main driver of productivity, growth and poverty reduction in most countries, the specific geographical challenges like increased impact of climate change, social instability affecting the northern districts and poverty traps are preventing this process to happen at a faster pace, and keeping people trapped in low productivity jobs in rural and increasingly also in urban areas. This component aims to alleviate constraints to poor and vulnerable households' productive inclusion in the market economy, through a phased program which will deliver a "bundle of services" to overcome multiple constraints. Because of the particularly young age structure of the Ugandan population, and the increasing rates of inactivity and unemployment among youth, this component will also have a focus on vulnerable youth, including girls. Some of the design principles include the importance of bundling interventions to achieve impact, the need for a targeting system with transparent eligibility and selection criteria, the need to define the scope of the project vis-à-vis leveraging or creating linkages with other initiatives, and capacity building and knowledge transfer to government institutions to maximize returns on investment.

Component (1) has two (2) subcomponents as follows;

***Sub-component 1.a Sustainable Livelihoods Enhancement in rural areas***

This sub-component is designed to strengthen the livelihoods of targeted beneficiaries who can productively engage in - or improve their existing - income-generating activities. It seeks to provide the opportunity to individuals that can be economically active to receive a package of productive services and support to enable them to engage in economic activities, save, be referred to relevant services, and gradually move out of poverty. This package of services and support will be provided through the project, which features a strategy grounded in good practice from the "economic inclusion approach," a sequenced, time-bound, and targeted set of interventions designed to support beneficiaries to move sustainably out of poverty and build their resilience. Economic inclusion type of programs which use the "graduation approach" have been piloted and adapted in several countries across the globe.<sup>4</sup> Randomized Control Trials (RCT) of some of these programs conducted by Innovations for Poverty Action showed that after 24-36 months, most participants (75-98 percent) met their program's graduation criteria with regards to nutrition, assets and social capital. It also showed strong gains for program participants in income and consumption, food security, assets, savings, and health.<sup>5</sup>

Evidence from Uganda related to the Youth Opportunities Project (YOP) under NUSAF 2; also found that YOP grants raised earnings by 38% and consumption by 10% four years after project ended<sup>6</sup>. This component proposes the use of an economic inclusion type of program to build on previous NUSAF 3

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<sup>4</sup> This includes a global program to pilot the approach in Ethiopia, Ghana, Haiti, Honduras, India, Pakistan, Peru and Yemen by CGAP and the Ford Foundation in partnership with international NGOs, local organizations, and governments.

<sup>5</sup> Additional evidence on the impact of economic inclusion programs is provided in the Economic Analysis section.

<sup>6</sup> Christopher Blattman, Nathan Fiala, Sebastian Martinez, 2018. *The long-term impacts of grants on poverty: 9-year evidence from Uganda's youth opportunities program.*

experience and support additional beneficiaries and measures to increase the productivity and earnings of poor and vulnerable beneficiaries. This sub-component will finance a package of economic inclusion interventions: a productive investment grant, intense capacity building of the recipients, promoting savings and financial inclusion, mentoring support along with referral to markets and services delivered by other sectoral government counterparts and organizations/programs. In an integrated development approach, this intervention is comprehensive and consists of a sequenced set of activities that aim to graduate people from poverty into sustainable livelihoods so that they can self-sustain themselves over the longer run. Beneficiaries will select a livelihood activity given their interests and abilities, guided in their choice by the project, and provided a market aperture exists (services, agriculture or livestock, etc.). Beneficiaries can choose to participate as individuals or in a group depending upon the local context. The package financed by this component will include the following: *Productive Investment Capital, Investments in capacity for development of micro entrepreneurship and soft skills, financial inclusion and savings groups, mentorship and Access to markets.*

### ***Sub-component 1.b Youth Employment and Opportunities***

The proposed sub-component will target vulnerable youth in urban or peri-urban areas, selected based on transparent and pre-agreed selection criteria. In line with youth employment programs worldwide, and in line with evidence on their effectiveness, this youth employment intervention will consist of a comprehensive package of support tailored to the needs of vulnerable youth in urban areas. The package will be further refined based on assessments of the youth profiles and constraints, as well as of the selected urban localities and their main market potential, but it has been initially identified with the following components: capacity building to increase technical and business skills as well as soft skills, mentoring, linkages to markets, support to access formal financial institutions, productive capital support. Micro entrepreneurship and soft skills development will support youth to overcome skills and mindset related constraints. Vocational trainings for the youth, traditionally delivered on a supply-driven basis by public centers and at a small scale by NGOs, often with donor support, have shown limited impact on employment and earnings,<sup>7</sup> especially for women.<sup>8</sup> On the contrary, other type of skills programs such as soft skills (for entrepreneurship), or entrepreneurship mindset programs, specifically designed for entrepreneurs in developing and emerging countries and that equip entrepreneurs with a proactive mindset (like personal initiative training) have showed positive impacts,<sup>9</sup> representing a potential alternative for many youth in Uganda.

Technical and entrepreneurial capacity building under this sub-component will focus on managerial and transversal technical skills that will help beneficiary youth better manage their productive activities, inform the use of their productive grant, learn how to start or run a business, etc. Programs will be adapted to local contexts to ensure that even the least-educated micro-entrepreneur or self-employed can understand and learn better business practices. The soft skills capacity building under this sub-

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<sup>7</sup> These services typically comprise learning an occupation (carpentry, electrical, mechanics, and so on), receiving a kit to work in that sector, or completing a traditional business training course.

<sup>8</sup> For example, World Bank, 2017. "Gender and Youth Employment in Sub-Saharan Africa: A Review of Constraints and Effective Interventions." World Bank Policy Research Working Paper 8245; and McKenzie and Woodruff, 2017. "Business Practices in Small Firms in Developing Countries." *Management Science* 63 (9)

<sup>9</sup> Adhvaryu, et al. 2017. "The Skills to Pay the Bills: Returns to On-the-job Soft Skills Training." National Bureau of Economic Research, Working Paper Series, number 24313.

component will focus on teaching how to think like an entrepreneur and on developing personality traits and attitudes that are typically displayed by successful entrepreneurs.<sup>10</sup> As these skills are useful in all contexts of life, as well as in the labor market, they will be useful to graduate youth out of inactivity, support their social inclusion and empowerment, to successfully engage in economic activities supported by the project but also to seek alternatives for a better life. Further scoping will inform grant size and delivery mechanisms, as well as linkages to market and to financial institutions for youth. Market assessments will guide both sub-components on the choice of economic activities that have potential to increase beneficiaries' income and return on investments. Last, implementation arrangements for this component will be defined based on best practices and on further discussions with the GoU.

## **Component 2: Strengthening Safety Nets for Enhanced Resilience and Human Development**

Building on the results and lessons learned from NUSAF 3 and other similar programs in the region the component will support poor and vulnerable households through layered safety-net support. And this has 3 (Three) subcomponents as follows.

### **Subcomponent 2.1: Climate smart Labor-Intensive Public Works (CS LIPW) program**

*Expansion of gender and climate-smart LIPWs to support able-bodied persons in poor and vulnerable households to address their consumption constraints and contribute to building resilience at local level against shocks*

The LIPW will provide beneficiaries from poor and vulnerable households a seasonal wage in return for their participation in gender and climate-smart LIPWs. The LIPW wage will allow participants from poor and vulnerable households to smooth their consumption and acquire assets, as evidenced in NUSAF 3. The project will support the integration of gender sensitive and climate smart public works that support community resilience against climate related shocks. The projects will focus on interventions that enable the community to adapt to and mitigate the impact of climate change and thereby enhance physical resilience against climate related shocks. The LIPW interventions will be implemented in high hazard prone districts with focus on drought and flood risks.

### **Subcomponent 2.2: Gender and nutrition sensitive safety net**

Labor constrained households with caring responsibilities such as pregnant and lactating mothers with younger children will be supported through “cash plus interventions” to enhance health, nutrition, and child cognitive development outcomes.

The cash plus interventions will include promoting co-responsibilities related to nutrition-awareness sessions for mothers, ante and post-natal care visits, backyard/kitchen gardening and promoting birth

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<sup>10</sup> Brandstätter, 2011. Personality Aspects of Entrepreneurship: A Look at Five Meta-Analyses. Published on: Personality and Individual Differences; Peprah et al 2015. Savings, entrepreneurial trait and self-employment: evidence from selected Ghanaian Universities. Journal of Global Entrepreneurship Research (2015) 5:1; Sánchez et al. 2011. The Rise and Fall of Job Analysis and the Future of Work Analysis. Annual Review of Psychology 63(1):397-425; Bischoff, KM, Gielnik, MM, Frese, M. When capital does not matter: How entrepreneurship training buffers the negative effect of capital constraints on business creation. Strategic Entrepreneurship Journal. 2020; 14: 369– 395.; Campos et al. 2017 Teaching personal initiative beats traditional training in boosting small business in West Africa (Article). Science, Volume 357, Issue 6357, 22 September 2017, Pages 1287-1290.

registration. This subcomponent targets districts that have a high incidence of poverty, are highly prone to droughts or floods and have low human development indicators. This will build on the successful Nutri-cash interventions implemented by WFP and OPM under the WB financed DRDIP in Uganda, the recently completed multi-sector nutrition project financed by the WB as well as a variety of similar early childhood development innovations implemented successfully in various African countries such as Rwanda. The WB team will discuss lessons learned and best practices from these programs with GoU to finalize the scope, target areas and households, and implementation modalities.

### **Subcomponent 2.3: Shock-responsive LIPW**

#### *Scaling up disaster risk financing interventions to support more households and districts during times of shocks*

The aim is to implement a mechanism for scaling up assistance to poor and vulnerable households in response to droughts and floods and to develop a system to pre-arrange financing for the costs of this expansion. The subcomponent will finance the cost of expanding the scalability mechanism developed for droughts in NUSAF3 to additional districts as well as the cost of establishing a similar scalability mechanism for floods. This includes building a flood model or index, related systems to monitor the index and capacity to trigger and operationalize a response. Based on the lessons learned from NUSAF 3 the DRF mechanism will initially be piloted in a few districts before expansion to more districts in the second and subsequent years of the project. This subcomponent targets districts that have a high incidence of poverty and are highly prone to droughts or floods.

### **Component 3: Transformational Delivery Systems**

This component will support the enhancement of social protection delivery systems to be shock-responsive and introduce digital delivery mechanisms. The strengthening of social protection delivery systems with a national outreach will be an important innovation, which supports the objective of making a shift from a project to program approach. This component will build on, and complement the work supported under NUSAF 3 and social protection systems strengthening ASA on development of national single registry and scaling up digital payments to social protection beneficiaries. This component will support the operationalization of a dynamic national social registry. It will allow for objective identification of poor and vulnerable households to benefit from a variety of social sector, shock responsive and economic inclusion programs in the country. The dynamic social registry will: Improve targeting, enhance efficiency of pro-poor public and private expenditures, support informed policy choices and decisions, and enable transformation of social protection programs to be shock responsive. Building on the beneficiary registry developed under NUSAF 3, the project will use a phased approach for the development of national dynamic social registry. The project will support the enhancements of the current infrastructures and systems of the beneficiary registry and additionally build a dynamic national social registry both at national and decentralized levels. The registry will consider mixed approaches of registration such as en-mass registration points, follow up visit by the registration officers or census in areas where poverty is extreme. The main registry data collection will be managed by the Ministry of Gender, Labor and Social Development (MoGLSD), in consultation with the key stakeholders including National Identification and Registration Authority (NIRA) - (National IDs,



Births and deaths registries), development partners and others to enable the national rollout and the linkages for interoperability. The project will support a series of integrated steps for the development of the national social registry, support advancing digital payments to build resilience and shock responsive social protection delivery systems and Beneficiaries will be supported to obtain necessary documentation before enrollment in the project.

#### **Component 4: Program Management, Controls and Accountability.**

The program management component will support project coordination, implementation, management, communication, monitoring and evaluation (M&E), environmental and social risk management, and fiduciary support. This component will support robust control and accountability functions, building on the previous Strengthening Transparency, Accountability, and Anti-Corruption (STAAC) interventions and further strengthen citizen engagement and risk management through engagement of institutions such as Inspectorate of Government (IG). Based on the experience of NUSAF3, a dedicated allocation will also finance a robust M&E function. This component will also include the support to the monitoring of environmental and social risks related to project implementation, and a robust citizen engagement and communications program to support outreach on the NUSAF IV project and to ensure full engagement of stakeholders to ensure impact of the program activities.

##### **1.2.3 Project Beneficiaries**

In terms of beneficiaries, the project will target poor and vulnerable households living in poverty and/or disaster-prone districts. The project will use a two-tiered approach to target project beneficiaries. First, it will select geographic areas based on an objective criterion related to poverty prevalence, vulnerability profile of the district (to hazards especially droughts and floods), and human development and labor market indicators. Secondly, after geographic targeting is completed, potential households will be identified in the selected areas based on a mixed approach of using Proxy Means Testing (PMT) combined with participatory community-based wealth ranking and validation exercise to profile the households for delivery of most relevant interventions supported by the project. This approach will build upon the best practices and lessons learned from various countries, which have used objectively verifiable PMT tool for measurement of household welfare along with triangulation of data with other relevant databases, as well as NUSAF3's rich experience with community-based targeting system. The principles for the targeting system and specific criteria will be further refined for different interventions. For instance, livelihood activities will employ application based-self-selection followed by other tools noted above to finalize the list of prospective beneficiaries. The overall targeting strategy will be guided by defining the roadmap for operationalization of the dynamic social registry during project preparation. It has been agreed with the GoU that the roll-out of the social registry will be accompanied by rolling out PMT in Uganda. The operationalization strategy will be discussed as part of project preparation.

Based on initial estimates and component financial allocations: under **component 1: 100,000 beneficiaries** will be supported with full livelihoods package and **1,500,000 beneficiaries** will be supported under **component 2** of safety nets for enhanced resilience and human capital development. Vulnerable youth will particularly benefit from activities under component 1 as they will be a primary

target group, given the unique demography of Uganda, and rising levels of inactivity and unemployment, as well as pervasive underemployment among them. They will benefit from skills development and empowering interventions, as well as access to finance and markets. Also, women will be a particular target group, and the project will ensure they are equally represented among beneficiaries.

#### 1.2.4 The Proposed Project Locations and Coverage

The selection of geographic areas will be guided by transparent and objective criteria based on technical considerations relevant for each component such as incidence of poverty, vulnerability to shocks, and status of human development indicators in the area. In addition, specific scoping for each of the interventions in the potential targeted areas will be conducted to make sure the project interventions are relevant and are not duplicating other key government and non-governmental programs but rather aligning to those objectives. Further, the mission discussed a gradual development of a national social registry for objective identification and better targeting of households in most needs to benefit from social sector programs in the country. It was also discussed and agreed that the design will explore how to better target youth to further the GoU’s commitment to accelerate human capital development and support the youth employment.

#### Vulnerable Groups Targeted by the Project

The Project’s target group will consist of both men and women, with emphasis on including vulnerable and marginalized persons of both genders as identified under the National Equal Opportunities Policy, 2022. The PIU will ensure that all categories of vulnerable and marginalized persons are included in all the stages and processes of the Project to ensure compliance with Uganda’s laws and policies on the inclusion of Vulnerable and Marginalised Groups (VMGs) in national activities and programs and the ESS 10 of the World Bank.

Grievance Redress Mechanisms (GRM) will be established in the selected Project areas to handle any grievance that may arise from the implementation of the Project. Table below shows the criteria that will be used to sample the VMGs under the proposed Project.

**Table 1: The Main Vulnerable Groups in Uganda**

Conflict related	Geographical related	Demographic categories	Poverty related
<ul style="list-style-type: none"> <li>• Internally displaced persons</li> <li>• War orphans</li> <li>• Former abductees</li> <li>• Households living in/near conflict zones</li> <li>• Refugees</li> <li>• Cattle rustling community</li> <li>• Refugee hosting</li> </ul>	<ul style="list-style-type: none"> <li>• Hard-to-reach and hard-to-live areas (mountainous areas, islands, those without access to roads and other social services)</li> <li>• Disaster prone areas (earthquakes, landslides, floods, drought, pastoral</li> </ul>	<ul style="list-style-type: none"> <li>• Widows and widowers</li> <li>• Orphans and abandoned children</li> <li>• Children living on street</li> <li>• Albinos</li> <li>• Female-headed households</li> <li>• Child-headed households</li> </ul>	<ul style="list-style-type: none"> <li>• Urban and rural poor</li> <li>• Casual workers</li> <li>• The chronically poor</li> <li>• Urban unemployed</li> <li>• Low paid workers (formal and informal)</li> <li>• Beggars</li> <li>• Squatters</li> </ul>

<p>communities</p> <ul style="list-style-type: none"> <li>Land conflicts (squatters, kibanja owners versus absentee landlords, people displaced by infrastructure developments or business establishments)</li> </ul>	<p>communities)</p> <ul style="list-style-type: none"> <li>Geographical imbalance (sparsely populated, poor services, poor infrastructure vis-à-vis low resource allocation)</li> <li>Miners and populations in mining areas</li> <li>Populations living near national parks and gazetted forests.</li> <li>People living in areas prone to epidemics (Ebola, tsetse flies, jiggers)</li> </ul>	<ul style="list-style-type: none"> <li>Persons with disabilities</li> <li>The chronically sick</li> <li>Terminally ill</li> <li>HIV/AIDS infected and affected persons</li> <li>Older persons</li> <li>Victims and survivors of GBV</li> <li>Victims and survivors of human trafficking</li> <li>Ethnic minorities</li> <li>Child mothers</li> <li>Illiterate/ unskilled persons</li> <li>Unskilled migrant workers</li> <li>Informal sector workers</li> <li>Juveniles</li> <li>PWDs</li> </ul>	<ul style="list-style-type: none"> <li>Landless</li> <li>Nomadic pastoralists</li> <li>Peasants</li> <li>Plantation workers</li> <li>Subsistence workers</li> <li>Unemployed persons</li> <li>Artisanal fishing communities</li> </ul> <p>Poor-large households</p>
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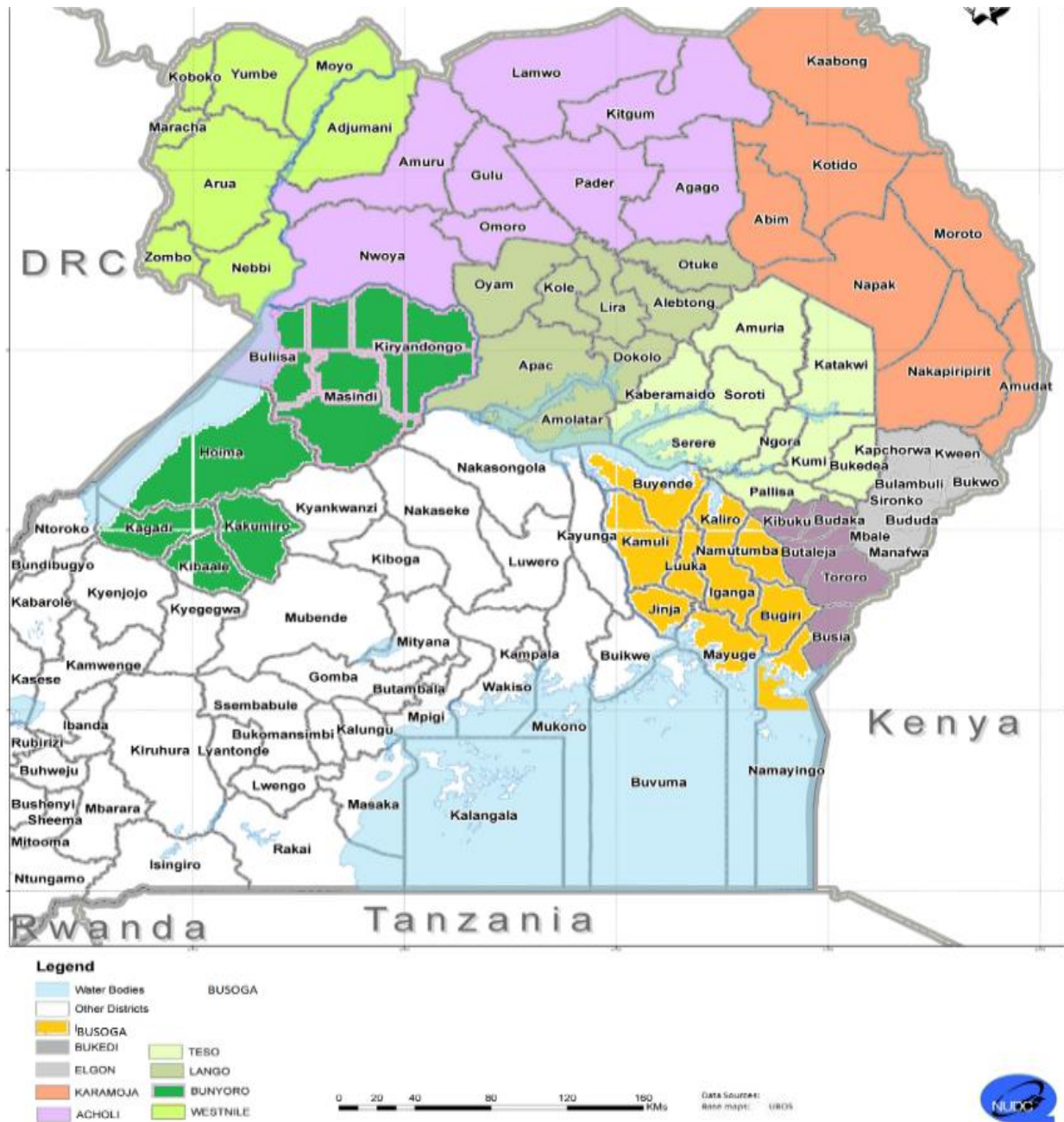


Figure 1: Proposed Regional Coverage by NUSAF IV Project

Location of Vulnerable and Marginalized Groups in the NUSAF IV Project Areas



**Figure 2: The Main Vulnerable and Marginalised Groups in NUSAF IV Project Area as Categorized under the National Equal Opportunities Policy, 2020.**

### 1.3 Purpose and Objectives of Stakeholder Engagement Plan

The purpose of the Stakeholder Engagement Plan (SEP) is to provide a forum and processes for meaningful participation of key stakeholders including community members, vulnerable and other social groups through which they can receive pertinent information about the project and share their ideas and concerns which will enable them to inform its design, implementation and management.

The overall objective of this SEP is to define a program for stakeholder engagement (SE), including public information disclosure and consultation, throughout the entire project cycle. The SEP outlines the ways in which the NUSAF IV (project team) will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about NUSAF IV project and any activities related to the project.

The involvement of the local population is essential to the success of the Project to ensure smooth collaboration between project staff and local communities and to minimize and mitigate environmental and social risks related to the proposed project activities.

The Key objectives of the SEP can be summarized as follows:

- Provide guidance for SE to meet the standards of international best practice.
- Identify key stakeholders that are affected, and/or able to influence the Project and its activities.
- Identify the most effective methods, timing and structures through which to share project information and to ensure regular, accessible, transparent and appropriate consultation;

- Develop a stakeholders engagement process that provides stakeholders with an opportunity to influence project planning and design.
- Establish formal grievance/resolution mechanisms.
- Define roles and responsibilities for the implementation of the SEP; and
- Define reporting and monitoring measures to ensure the effectiveness of the SEP and periodical reviews of the SEP based on findings.

In March 2024, following the enactment of the Anti-Homosexuality Act, 2023, this SEP now includes specific measures to mitigate the risk of discrimination against or exclusion of any affected vulnerable or marginalized individuals or groups in providing or receiving benefits in World Bank financed projects and programs in Uganda. These mitigation measures are described in Section 3.2.10 (Social Exclusion and Discrimination) and in Annexes 13 and 14 of the proposed NUSAF IV ESMF. In addition, this SEP ensures that such vulnerable or marginalized individuals or groups are consulted appropriately.

## **Stakeholder Identification, Analysis and Communication Methods**

### **1.4 Principles of Stakeholder Engagement**

The project implementation procedures will promote and allow for meaningful and culturally appropriate consultation and participation, including that of host communities at the different levels, as well as the right to public information and disclosure. To realize this, the SEP has considered the following principles including those based on ESS10 and International Best Practice (IBP):

- ***Openness and life-cycle approach:*** public consultations for the Project will be arranged during the whole project life cycle, carried out in an open manner, free of external manipulation, interference, coercion or intimidation;
- ***Informed participation and feedback:*** information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders' feedback, for analyzing and addressing comments and concerns.
- ***Inclusiveness and sensitivity:*** stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the project(s) is inclusive. All stakeholders always are encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups, in particular women, youth, elderly including diverse ethnic groups and other vulnerable or marginalized individuals or groups following the enactment of the AHA;
- ***Two-way dialogue*** that gives both sides the opportunity to exchange views and information, to listen, and to have their issues heard and addressed. This includes incorporating feedback into project or program design and reporting back to stakeholders.
- ***Honesty and transparency*** will be a key pillar in interaction with stakeholders.
- ***Flexibility:*** If social distancing inhibits traditional forms of engagement, the methodology

should adapt to other forms of engagement, including internet, telephone, postal or other means of communication. Stakeholder engagement will be carried out in compliance with national (MoH) SOPs and the World Bank technical note on public consultations and SE.

- **Meaningful and inclusive participation** of all stakeholders including vulnerable or marginalized individuals or groups following the enactment of the AHA, and the right to an effective, safe, ethical and confidential grievance redress system will be upheld.
- **Clear mechanisms for responding to stakeholders' complaints and grievances.** This includes the **Survivor Centered Approach** for responding to **complaints and grievances** related to GBV including SEA, as well as a pathway to safely, ethically, and confidentially receive cases related to exclusion or discrimination of vulnerable or marginalized individuals or groups following the enactment of the AHA.
- Culturally appropriate approaches that promote mutual respect; and recognizes stakeholders' rights, interests, cultural practices, language needs, values, and beliefs will be employed. Inclusiveness will be promoted through appropriate and multiple stakeholder participation approaches for both highly visible and the typically underrepresented stakeholders, such as minority groups, women, youth, and other vulnerable or marginalized individuals or groups.

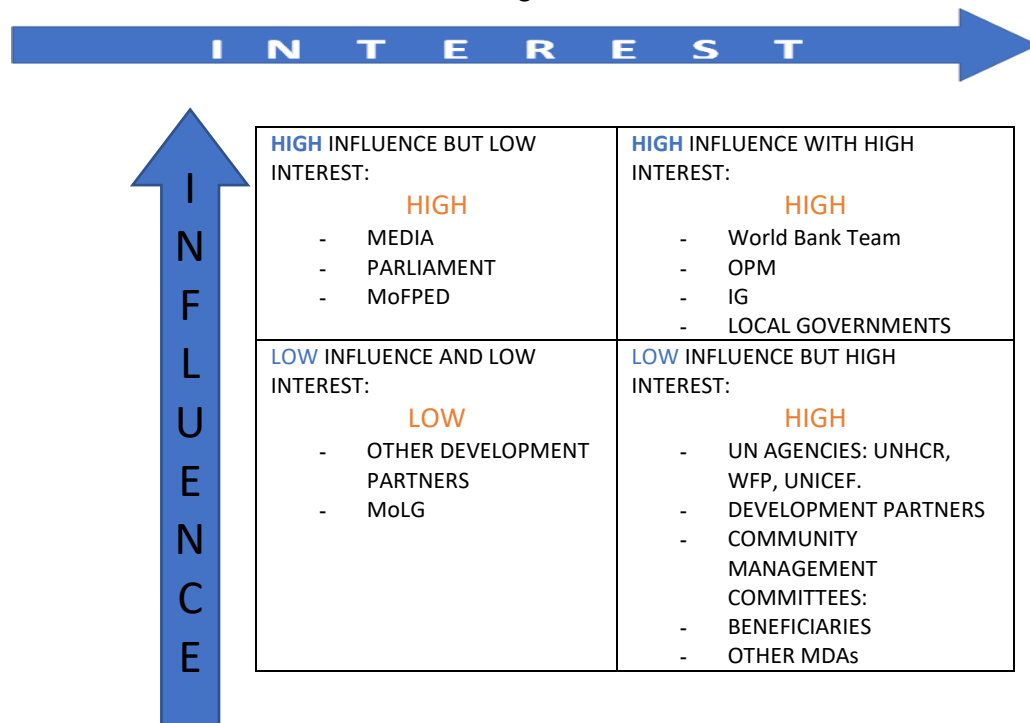
### 1.5 Stakeholder Identification, Mapping and Analysis

The SE process for the NUSAF IV project will start from identification, mapping and analysis. It is anticipated that this SEP will help clarify the stakeholder identification procedure at the national level for the forthcoming stages. This will guide NUSAF IV and allow complying with above cited commitments (national and international). The following criteria, adjusted to take account of local specific conditions, are proposed to be used for the identification of stakeholders:

- **Liability:** project implementation or on-going operations may result in legal, financial or other liabilities of the proponent to a social group;
- **Influence:** a social group may be able to substantially influence project implementation or on-going operations;
- **Partnership:** there are opportunities for building partnership relations between the project developer and a given social group in the framework of the project implementation or on-going operations;
- **Dependency:** project implementation may significantly affect a given social group, in particular, it may affect vital interests of its representatives if they are dependent on the project on-going operations in economic or financial terms;
- **Representation:** a social group may have a right to represent interests with regard to a project or on-going operations, and this right is legitimated through legislation, custom and and/or cultural specifics;
- **Expressed interest:** a social group and/or individual may express interest to a project or on-going operations, and this group is not necessarily directly affected by the planned or current activities.

In a systematic manner, keen observation should be considered to ensure the level of influence and interest of a particular stakeholder is established. This enables the project team to ascertain how low

or high a particular stakeholder is placed, considering both influence and interest in the project. The matrix below can be of value in establishing this.



In Table 2 below, the identification and analysis of stakeholders is presented.

**Table 2: Stakeholder identification and analysis**

Stakeholder Group	Interest/Cause in Engagement
<b>National level</b>	
World Bank Team (Task team leader, Country manager, technical officers)	Ultimate high interest the results but along the way also interested in the fulfillment of the process guidelines.
UN Agencies and other development partners	Represents the interests of different interest parties and vulnerable groups
Ministries, Departments Agencies (MDAs) Ministries: MoFPED, MTIC, MAAIF, MoGLSD, MWE, MoH and MoLG Departments and Agencies: NEMA, NFA, NPA, EOC, OWC, NARO, UBOS, IG and Academia including Members of Parliament	Legislative and executive authorities. Functions of supervision and monitoring
NGOs/CBOs	Represents the interests of different interest parties including vulnerable or marginalized individuals or groups
Mass media	They are intermediaries for informing the general public about the planned activities of the project developer(s) and for information disclosure in connection with the proposed Project.



<b>Stakeholder Group</b>	<b>Interest/Cause in Engagement</b>
Academic, Research and Scientific Institutions	Scientific understanding of the range or problems associated with the proposed Project. Scientific approach to the relevant issues. Possible specialists' provision for further activity in project implementation.
Business community / Private sector	Economically interested business entities (conclusion of contracts, economic damage due to competition, etc.); they can be also potential customers of the project developer.
Project employees and Project's sub-contractors	Technical understanding of the range or problems associated with the proposed Project.
<b>District level</b>	
Local Governments of Project Area Districts/ Sub counties	Legislative and executive authorities. Functions of supervision and monitoring
Local NGOs/CBO/ faith-based institutions	Represents interests of different interested parties and vulnerable or marginalized individuals or Groups following the enactment of the AHA
Mass media	They are intermediaries for informing the general public about the planned activities of the project developer and for information disclosure in connection with the proposed project.
Business community	Economically interested business entities (conclusion of contracts, economic damage due to competition, etc.); they can be also potential customers of the project developer.
Local communities	Interested parties living in regions/ districts of project activities that could be indirectly affected by the realization of the projects
<b>Local level</b>	
The Parish Development Council (PDCs), including Area counselors	Represents interests of affected communities and vulnerable groups
Local Business community/ Private sector including chain Stores	Economically interested business entities (conclusion of contracts, economic damage due to competition, etc.); they can be also potential customers of the project developer.
Settlements (Settlement commandants and team, Development partners, Landlords in northern Uganda and West Nile Refugees)	Represent interests of communities under their jurisdiction.
Local land users and other local population (Cultural Institutions and Opinion leaders (Religious leaders and Institutions, LC1s and area councilors Beneficiary groups)	Potential vulnerable or marginalized individuals or groups affected communities and other interested parties living in the close vicinity.
VMGs and Ethnic Minorities namely the	Project proponents to appreciate their vulnerable position

Stakeholder Group	Interest/Cause in Engagement
IK, TEPET, BENET and other Vulnerable or Marginalized Individuals or Groups.	<p>and to put in place appropriate measures that will enable them to access project benefits.</p> <ul style="list-style-type: none"> <li>• Project proponents to appreciate their disproportionate higher risk of exposure to project related risks and adverse impacts and put in place appropriate mitigation measures</li> </ul> <p>Inclusion of VMGs in national programs is a constitutional requirement ESS7 was triggered which makes it mandatory for the project to engage with the identified ethnic minorities -the ESCP requires that a VMG plan be prepared and adopted prior to implementation of activities in areas that have Vulnerable and Marginalized Groups.</p> <p>Many VMGs and other Vulnerable or Marginalized Individuals or Groups such as PWD and PLHIV are represented by influential CSOs which gives them a strong voice.</p>

### 1.6 Project stakeholders

Project stakeholders are ‘people who have a role in the Project, or could be affected by the Project, or who are interested in the Project’. Project stakeholders are categorized into two groups i.e. primary and secondary. Primary stakeholders are individuals, groups or local communities that may be affected by the project, positively or negatively, and directly or indirectly. This category also includes those who are vulnerable or marginalized individuals or groups following the enactment of the AHA.

Conversely, secondary stakeholders are those stakeholders who may be able to influence the outcome of the project because of their knowledge about the affected communities or political influence over them.

Thus, Project stakeholders are defined as individuals, groups or other entities who:

- (i) Are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project (also known as ‘affected parties’); and
- (ii) May have an interest in the Project (‘interested parties’). They include individuals or groups whose interests may be affected by the Project and who have the potential to influence the Project outcomes in any way.

Cooperation and negotiation with the stakeholders throughout the project development often also require the identification of persons within the groups who act as legitimate representatives of their respective stakeholder group, i.e. the individuals who have been entrusted by their fellow group members with advocating the groups’ interests in the process of engagement with the Project.

Community representatives may provide helpful insight into the local settings and act as main conduits for dissemination of the Project-related information and as a primary communication/liason link

between the Project and targeted communities and their established networks. The legitimacy of such representatives may stem both from their official elected status and their informal and widely supported standing within the community that allows them to act as focal points of contact in Project's interaction with its stakeholders. Examples of legitimate stakeholder representatives include and are not limited to:

- Elected officials of regional, local, and village councils and self-governance bodies;
- Leaders of informal or traditional community institutions such as village headpersons or chiefs of the communes;
- Non-elected leaders that have wide recognition within their community, such as chairpersons of local initiative groups, committees, local cooperatives etc.;
- Leaders of community-based organizations, local NGOs and women's groups;
- The elders and veterans within the affected community;
- Religious leaders, including those representing traditional faiths;
- Teachers and other respected persons in the local communities, etc.

Verification of stakeholder representatives (i.e. the process of confirming that they are legitimate and genuine promoters of the community they represent) remains an important obligation in establishing contact with the community stakeholders. Legitimacy of the community representatives can be verified by talking informally to a random sample of community members and heeding their views on who can be representing their interests in the most effective way.

### **1.7 Processes to follow during stakeholder Engagements –Practicalities**

The process of SE planning as set out in the World Bank ESF 2018 under ESS10, should contain the following:

- i) Stakeholder identification and analysis;
- ii) Planning how the engagement with stakeholders will take place;
- iii) Disclosure of information;
- iv) Consultation with stakeholders;
- v) Addressing and responding to grievances; and
- vi) Reporting to stakeholders.

All stakeholder and community consultations are to be documented, logged, with participants registered and their signatures recorded to document attendance.

Consultations should be undertaken by the implementing agencies and the contracted Consultant with an introduction, a presentation of the Project and its parties, a question-and-answer session and a conclusion. Contact details of the relevant parties to the Project should be shared and support material be prepared so as to be understood by the stakeholders (in terms of languages and visuals, for instance).

All methods of engagement shall also consider custom and cultural importance of the given areas such as gesture, personal presentation and language. Similarly, because of the existing pandemics such as

COVID-19 & Ebola, the National, World Bank and WHO guidelines & SOPs for example, physical distancing will also be followed to mitigate the risk of spreading and contracting the viruses.

All information collected should be summarised and confirmed with stakeholders at the end of the discussions. Stakeholders will also be given time to share their concerns and views and any further clarifications they require at the end of the meetings. All queries raised by the stakeholders are to be responded to and noted to feed into the Environmental and Social Impact Assessment (ESIA) process. During consultations, the gender of the stakeholders should be identified and registered into the stakeholder registration form.

### **1.8 Methodology and Approach for Stakeholder Engagement**

Preparation of this SEP was done in accordance with applicable Standards of the World Bank's Environmental and Social Framework (ESF) specifically ESS10: Stakeholder Engagement and Information Disclosure as well as Uganda's laws and policies. It also involved literature reviews; stakeholder consultations and discussions with relevant sectors, institutions and agencies, including but not limited to: Ministry of Local Government (MoLG), Ministry of Water and Environment (MWE), Ministry of Trade, Industry and Cooperatives (MTIC), National Environment Management Authority (NEMA), National Forestry Authority (NFA), Ministry of Gender, Labour and Social Development (MGLSD), Ministry of Agriculture, Animal Industry and Fisheries (MAAIF), among others. Additionally, local government officials comprised of; District officials, sub county officials, parish officials and general community members were consulted from sampled local governments across all the nine (9) NUSAF IV implementing sub regions. These sub regions and corresponding districts were Bunyoro (Kakumiro and Kikube), West Nile (Zombo and Terego), Acholi (Adjumani), Elgon (Bududa, Manafwa & Mbale), Sebei (Bukwo), Bukedi (Butalejja, Buyende and Busia), Busoga (Jinja and Kamuli), Karamoja (Nakapiripirit, Nabilatuk, Moroto, Karenga, Napak, Kaabong and Abim) plus Teso (Otuke & Soroti). Pictorial evidence of these engagements is presented under Annex 5.

The Project assessment and implementation procedures promotes and allows for meaningful and culturally appropriate consultation and participation, including that of host communities at the different levels, including the right to public information and disclosure. Likewise, ESS10 recognizes the importance of open and transparent engagements between stakeholders which allows project teams to respond to concerns and grievances raised by affected communities through an established GRM. (Refer to Chapter 7 for detailed exploration of GRM.) Managing grievances is an integral part of SE far and beyond the SEP as well as the VMGP, RPF and ESMF study phase.

The Project intend to utilize various methods of engagement that will be used by as part of its continuous interaction with the stakeholders. For the engagement process to be effective and meaningful, a range of various techniques need to be applied that are specifically tailored to the identified stakeholder groups. Methods used for consulting with statutory officials may be different from a format of liaising with the local communities (focus group discussions, displays and visuals with a lesser emphasis on technical aspects).

The format of every consultation activity should meet general requirements on accessibility, i.e. should be held at venues that are easily reachable and do not require long commute, entrance fee or preliminary access authorization, cultural appropriateness (i.e. with due respect to the local customs

and norms), and inclusiveness, i.e. engaging all segments of the local society, including disabled persons, the elderly, minorities, and other vulnerable individuals. If necessary, logistical assistance should be provided to enable participants from the remote areas, persons with limited physical abilities and those with insufficient financial or transportation means to attend public meetings scheduled by the project.

Ensuring the participation of vulnerable individuals and groups in project consultations may require the implementation of tailored techniques. Since their vulnerable status may lead to people's diffidence and reluctance or physical incapacity to participate in large-scale community meetings, visiting such individuals/ families at their homes or holding separate small group discussions with them at an easily accessible venue is a way for the project to reach out to the groups who, under standard circumstances, are likely to be insufficiently represented at community gatherings.

The NUSAF IV Project will also target the vulnerable or marginalised individuals or groups following the enactment of the AHA and other disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project or persons who may be disproportionately impacted or further disadvantaged by the project as compared with any other groups due to their vulnerable status and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project. Vulnerable status may stem from an individual's or group's race, national, ethnic or social origin, colour, gender, language, religion, political or other opinion, property, age, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, dependence on unique natural resources, etc. Under NUSAF IV, this category also includes VMGs or ethnic minorities, namely, the IK, TEPETH, and BENET.

The World Bank ESF defines disadvantaged or vulnerable as those who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits. Such an individual/group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/or assistance to do so. This will consider age, including the elderly and minors, and including in circumstances where they may be separated from their family, the community or other individuals upon which they depend.

Vulnerable or disadvantaged individuals or groups can thus be:

- *Female-headed households, who may be impaired from accessing information because they are disproportionately impacted by poverty, access to resources or lack of voice in the community, or because they have limited time to participate because of their activities and various commitments, but could be adversely impacted by Project activities such as workers' influx;*
- *Elderly people, who may be impaired from accessing information, maybe because they are incapacitated to read, to hear or to walk, or because they live alone and at a distance that prevent them from accessing information available in public places or near the sub-project sites, even though they might be adversely impacted by construction activities such as noise;*
- *People with disability who may also be impaired from accessing information and yet be adversely impacted by Project activities if for instance these generate obstruction works on a road which would adversely impact people using wheelchairs or visually impaired persons;*

- *Youth and children, whose views may not be listened to but who may be adversely impacted by Project activities such as increased traffic or community health and safety impacts; and*
- *Households deemed to reside below the poverty lines, or whose income is significantly lower than the average income of their surrounding communities, that may be affected by the Project and therefore their income status could be further impacted.*
- *Vulnerable or marginalised individuals or groups following the enactment of the AHA who may suffer discrimination against or exclusion in providing or receiving benefits from the Project following the enactment of the AHA in 2023.*

### **The Vulnerable and Marginalized Groups of Uganda**

Several ethnic minority groups in Uganda have been identified according to the World Bank's ESS7, on the identification of VMGs. There are some groups within the NUSAF IV Project areas that suit the definition and will need to be identified for special engagement. They include traditional hunters and gathers' communities of:

- Ik, who live on the edge of the Karamoja - Turkana region along the Uganda - Kenya border in Kaabong District, Karamoja;
- Tepeth, also referred to as the Soo. They live in Mount Moroto and neighbour the Turkana and the Pokot on the Kenyan border and;
- Benet, also known as Ndorobos, who live in Kween District on the margins of and inaccessible parts on the slopes of Mt. Elgon in the north-eastern part of Uganda.

The entry point to these communities is through their trusted and chosen leaders. It will be preferable that these leaders are given adequate information about the NUSAF IV Project before the entire community can be brought in. With such an approach, the leaders who have the trust will be able to explain the content of the project in the local language most appropriate to the affected community. Community meetings are the most preferable means of engagement with these communities in locations selected by the VMGs themselves.

#### **1.8.1 Literature Review**

Literature review involved desktop reviews of documents to check for consideration of the Project's key themes as well as planning, methodological and implementation requirements. It was very useful for triangulation purposes to seek convergence and corroboration of approaches and findings from different data sources and methods. The review entailed reading legal and policy instruments, guidelines, and reports on related projects.

Some of the key documents that have been reviewed include:

- a) The World Bank ESF 2018, Washington, D.C.
- b) Environmental Guidelines to Local Governments for strengthening Compliance with Safeguards Requirements in Development Projects November 2020, MoWE, Uganda.
- c) Social, Safety and Health Safeguards Implementation Guidelines for Local Government October 2020, MoGLSD, Uganda.
- d) SEP, GROW Project, MoGLSD.
- e) SEP, Food Systems Resilience Program for Eastern and Southern Africa, April 2022

- f) SEP, Prime Minister’s Delivery Unit, Enhancement of Productivity, Accountability and Knowledge Systems Project

### 1.8.2 Meetings

The World Bank’s ESS10 recognizes the importance of inclusive and meaningful engagement between the Borrower and Project stakeholders as an essential element of good international practice. Effective SE can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation. In keeping with the requirements of ESS10, the OPM took cognizance of the existing World Bank (March 2020) and Ministry of Health 2020 guidelines in relation to physical meetings, and used online platforms such as Zoom, Google meet, WebEx, WhatsApp and Email exchanges to conduct extensive, meaningful and timely consultations.

The discussions focused on the general scope of the Project, and particularly on ways of increasing security of land rights and strengthening land administration and management systems in selected geographic areas in Uganda while observing the necessary sensitivity to land issues. The views from these consultations were recorded, analyzed and appropriate measures recommended as part of the SEP where necessary. A summary of the views about the project provided by the stakeholders, and responses to some inquiries is captured under Table 3 below.

Table 3: Stakeholders Identified and Consulted So Far

Stakeholder	Key personnel consulted*	Date	Method of Engagement	Gender		
				Male	Female	Total
Bunyoro and West Nile		Jan. 30-Feb 3, 2023	Town Hall meeting	60	178	238
Busoga and southeastern		Jan. 30-Feb 3, 2023	Town Hall meeting	40	127	167
Karamoja and Teso		Jan. 30-Feb 3, 2023	Town Hall meeting	82	244	326
Elgon and Bukedi		Jan. 30-Feb 3, 2023	Town Hall meeting	89	293	382
Karamoja		Jan. 30-Feb 3, 2023	Town Hall meeting	87	100	187
Total		Jan. 30-Feb 3, 2023	Town Hall meeting	358	942	1300

\*The key personnel among the stakeholders in the consultations included: The Chief Administrative Officer, Heads of Departments of Natural Resources, Community Development, Production, Commercial Office and the political leadership (LC V Chairperson and the RDC) at district level and at the lower local government, the key stakeholders were: The Senior Assistant Chief Administrative Officer, Community Development Officer, Production Officer and the LC III Chairperson.

Table 4: Key Stakeholder Issues Raised and responses

Stakeholder	Issues/Concerns	Responses
Karamoja Region	Human animal conflicts in the IK lands in Kaabong, Karenga, Nakapiripirit, Nabilatuk, Napak and Moroto requires special attention and discussions initiated between NUSAF IV, Karamoja Ministry, Defense and UWA. And clear management and compensation measures agreed upon address issues related to community lives and livelihood destruction.	<i>Meaningful broad-based discussions will be initiated with relevant agencies and amicable measures agreed / documented before commencement.</i>
	Insecurity issues in Karamoja need to be holistically and sustainably managed as this will affect NUSAF IV implementation by communities. Cordon and search carried out now at disarmament exercise at wee hours has continued to scare many communities' able-bodied members and a majority no-longer stay in their homes.	<i>Relevant authorities will engage security agencies in the region to agree on harmonisation modalities</i>
	The project to have special consideration to promote food production in schools to support feeding and contribute to education out comes (retention, girl child participation, enrolments, nutrition, performance, etc.)	<i>Efforts will be made to take this into consideration during components design by design team, though the project focuses more on social protection</i>
	Health systems strengthening to be part of the nutrition component either supported by government or development partners in partnership with NUSAF IV.	<i>(ESS4 community Health and safety)</i>
	The Project to promote water for production (Irrigation and livestock use) in all districts.	<i>Efforts will be made to take this into consideration during components design by design team, though the project focuses more on social protection</i>



	<p>Production on and off farm activities be informed by agricultural zoning of wet and dry areas. This will enable communities to maximize production and results in the end.</p>	<p><i>Efforts will be made to take this into consideration during components design by design team, though the project focuses more on social protection</i></p>
	<p>Under savings, the commercial officers provided with clear modules to support savings component and also a reporting module developed through MIS to track households savings from livelihood and public works participants.</p>	<p><i>This will be strongly considered.</i></p>
	<p>The project to promote regeneration and assisted regeneration of degraded ecosystems through area closures for indigenous species in degraded fragile ecosystems such as riverbanks, wetlands, reserves etc. This will support maintenance of indigenous species</p>	<p><i>This will be strongly considered during the design process</i></p>
	<p>Timely disbursement of sub projects funds latest by second quarter of every FY to facilitate proper planning, implementation and accountability of project funds. The experience under NUSAF3 saw lots of funds swept back which subsequently affected implementation and accountability of funds.</p>	<p><i>This will be strongly considered.</i></p>
	<p>Skilling the youth and women through vocational training centers and mentorship for 1) Soft skills of life (behaviours, goals, vision) (decision making, personal development to develop personal goals both soft and long-term individual goals) and 2) work reediness skill to prepare the to the world of work and specifically on income, vision e.g. carpentry, crafts, welding, events management, ware/storage management, etc. (Financial literacy ability to budget and save, VSCL, meet plans in the soft skills)</p> <p>Enhance the CDOs mobilization role and mind set change activities to support smooth uptake and sustainability of NUSAF interventions. This should be in-line with the PDM pillars.</p>	<p><i>Youths and women employment is strong under NUSAF IV including mindset change. Linkages will made with other government programmes such as GROW Project, PDM, Emyooga etc.</i></p>
	<p>Create a technical working group for this team to manage and dissemination of results systematically and accurately in various products to the project stakeholders.</p>	<p><i>Noted</i></p>
	<p>Local Environment Committees and Grievance Redress Committees established in all parishes to support in monitoring the implementation of Safeguards on site and off sites activities done at community levels in-line with the National</p>	<p><i>The project will establish and operationalise a robust Grievance Redress Mechanism (GRM),</i></p>

	Environment Act 2019 and manage complaints and grievances at community levels.	
	VMGs plan needs to be developed and monitored on as was in NUSAF3 and disclosed.	<i>The VMGP has been developed.</i>  <i>Address ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional and these have already been identified including the IK, Tepeth, and Benet</i>
Elgon Region	Human-animal conflicts in the sub-region especially in Bududa districts where the people who enter the National Park are sometimes mistreated and/or killed by the park authorities. This requires special attention and discussions initiated between NUSAF IV, district local governments, Ministry of Defense and UWA. Management options that allow people to access the park resources through a collaborative management should be promoted.	<i>(ESS4 requirements community health and safety (security of the beneficiaries) Meaningful broad-based discussions will be initiated with relevant agencies and amicable measures agreed / documented before commencement.</i>
	The project should prioritize construction of Schools to reduce the levels of illiteracy in Amudat. In all districts visited (Amudat Bukwo, Bududa, Manafwa and Mbale) the structures are dilapidated, while some areas do not have schools Amudat district particularly called for construction of boarding schools given the insecurity in the district. The construction of schools for both primary and secondary with a component of dormitories and staff houses can be extended to all districts in Elgon sub region. Districts, therefore, recommend that part of the funds be used to construct schools, dormitories as well as teachers' houses.	<i>This is noted; however, the project focuses more on social protection. Where possible linkages with other programmes will be explored.</i>
	Establishment of rehabilitation centres for GBV/VAC victims to offer counselling services especially in Bukwo & Manafwa districts.	<i>(ESS4 requirements community health and safety (security of the beneficiaries) social risks management is strong under the project and will even include a GBV/VAC Action Plan.</i>
	Construction of proper water drainage channels to reduce on waterlogging common in many parts of the sub region.	<i>(ESS4 requirements community health and safety) Noted</i>
	Marketing component strengthened through marking specific production zones for specific products and linking buyers to those zones.	<i>Noted for consideration during component design</i>
	The project should consider integration of alternative efficient energy sources since over 90% of the people depend on firewood.	<i>Noted for consideration during component design</i>

	Time release of funds to support project activities.	<i>Noted for serious consideration</i>
	VMGs should be assisted to acquire all registration requirements.	<i>The project shall work with NIRA to ensure people register and get IDs in time.</i>
	Intensify communication for development and with a focus on beneficiaries who are direct project stakeholders (use of social media, radios, TV shows) where these categories go speak on behalf of the project.	<i>The project will develop and implement a robust communication strategy</i>
	ESMP funds clearly provided for, and contingency budget embedded to cater for un-anticipated crisis.	<i>Each of the component (health safety, Environmental and social risks management) have clear budget codes.</i>
Bunyoro	Security organs need to be involved in the districts to mitigate vandalism of infrastructures.	<i>Security agencies will be strongly engaged and brought on board early enough.</i>
	The project to consider providing direct benefits in education other than parents earning and taking their children to school. This could include construction of better schools and where structures exist then they can be renovated for a better learning environment. It was mentioned by one of the RDCs that many children tend to drop out of school in P3 and P4. This is because they would lack motivation while at school since they would sit on dusty floor at home and experience the same at school.	<i>This is noted; however, the project focuses more on social protection. Where possible linkages with other programmes will be explored.</i>
	Consideration to increase budget for health services as well as infrastructure in hard-to-reach places since the communities' host refugees even though they may not be documented and are not in camps. The high number of refugees has increased pressure on services offered to the population, health inclusive.	<i>This is noted; however, the project focuses more on social protection. Where possible linkages with other programmes will be explored.</i>
	With expectation of increased production, the project should include a valuation program and improve the value chain of whatever shall be produced by the communities. This will ensure more job creation in the community and therefore gain more financially rather than sell the produce directly to middlemen/brokers who tend to gain more than the producers. Introduction of irrigation to boost production.	<i>This is noted for design consideration. Also, synergies and linkages will be explored.</i>
	Inclusion of local government leadership in the project design to minimize challenges as experienced in the predecessor projects. Much of	<i>This is a key guiding principle, and these consultative meetings are part of the initials steps, and many others will follow.</i>

	<p>the challenge as expressed were around beneficiary targeting and identification of appropriate enterprises for the beneficiaries.</p>	
	<p>Project to consider mindset change training to all beneficiaries as an introduction/initiation to participate in project activities. Many of the community members were said to have poor mindset and would not be transformed if they are funded in the current state.</p> <p>In addition to mindset change, all targeted beneficiaries should also receive financial literacy to enable them to handle and plan better whatever they shall earn. This will also help reduce conflict among group members and most especially in homes.</p>	<p><i>Mindset change is strongly considered in the design. This is line with other programs such as PDM.</i></p>
	<p>Request to engage ICT officers at the direct level for better implementation especially with the use of MIS. In the previous projects, ICT officers would only have last minute considerations to support challenges rather than work with the administration and management to avoid or eliminate the challenges.</p>	<p><i>The project will embrace digital approaches, and a robust MIS will be designed early enough. The design process will be participatory. The MIS will be decentralised and district staff including ICT will have an active role and granted access / user rights.</i></p>
	<p>Labor officers to be involved in the projects and should routinely visit sites to listen to the plight of the workers and ensure legal and regulatory requirements are followed and implemented (ESS 2).</p>	<p><i>This will be provided for under the project safeguard system and structure.</i></p>
West Nile	<p>Many of the children do not finish their education especially primary level, at about P4, they dropout. With little and poor exposure, they are not able to sustain initiatives taken in such social action programs.</p>	<p><i>The NUSAF IV project has youths especially school dropouts as key target beneficiary for support.</i></p>
	<p>The project should consider provision of technology and machines for agriculture. NAADS gave Terego one tractor and the cost of hiring the tractor is high.</p>	<p><i>Noted.</i></p>
	<p>Fears of Centralised procurement of certain supplies which limits support for local content and in agriculture may increase failure of some enterprises.</p>	<p><i>The project will be based on CDD Modality with various functions including procurement entrusted with beneficiary community structures.</i></p>
	<p>All targeted beneficiaries in the project should have training on mindset change and sensitization.</p> <p>Some of the benefits should be in bits and the beneficiaries should be sensitised on how to plan the use of their incomes.</p>	<p><i>Mindset will be strong under the project, in line with other programs such as PDM.</i></p>

## 1.9 Description of Engagement Methods

Various methods of engagement were used as part of the project's interaction with the stakeholders, to ensure that different stakeholder groups are successfully reached and are involved in the process of consultation, decision-making and the development of impact management solutions.

International standards increasingly emphasize the importance of a consultation being 'free, prior and informed', which implies an accessible and unconstrained process that is accompanied by the timely provision of relevant and understandable information. To fulfill this requirement, a range of consultation methods are applied that specifically focus on this approach.

Information that is communicated in advance of public consultations primarily includes an announcement thereof in the public media – local, regional and national, as well as the distribution of invitations and full details of the forthcoming meeting well in advance, including the agenda. It is crucial that this information is widely available, readily accessible, clearly outlined, and reaches all areas and segments of the target community.

The field visits were used to identify through the various stakeholder consultations the commonly and widely understood local languages that should be used for publicizing, conducting and recording/reporting on the consultations carried out and for each of the regions the following local languages were identified in the respective locations as follows: Bunyoro- Runyoro and Rukiga; West Nile - Alur, Lugbara and Madi; Acholi and Lango – Luo; Karamoja – Ngakarimojong; Teso – Ateso; Elgon – Lumasaba and Kupsabiny; Bukedi – Lusamia, Lunyole, Lugwere, Jopadhola and Ateso; and in Busoga – Lusoga.

These parameters can be achieved by implementing the following approach:

- Advance public notification of an upcoming consultation meeting follows the same fundamental principles of communication, i.e. it should be made available via publicly accessible locations and channels. The primary means of notification may include mass media and the dissemination of posters/ advertisements in public places. The project keeps proof of the publication (e.g. a copy of the newspaper announcement) for accountability and reporting purposes. Existing notice boards in the communities may be particularly useful for distributing announcements, such as boards adjacent to the widely visited public premises.
  - post offices, chain stores, transport links, and offices of the local NGOs. When the notifications are placed on public boards in open air, it should be remembered that the posters are exposed to weather, may be removed by passers or covered by other advertisements. The project's staff will therefore maintain regular checks to ensure that the notifications provided on the public boards remain in place and legible.
- Another critical aspect of the meeting preparation process is selecting the methods of communication that reach the potential audience with lower levels of literacy or those who are not well-versed in the technical aspects of the proposed. Oral communication is an option that enables the information to be readily conveyed to such persons. This includes involving the selected community representatives/ local NGOs/faith-based organizations and initiative groups to relay up-to-date information on the project and consultation meetings to other

members of the community, Advertising the project and the associated meetings via radio or TV and making direct calls (in case fixed-line or mobile phone communication is available) is another method that allows reaching out to the remote audiences. The announcement of a public meeting or a hearing is made sufficiently in advance, thereby enabling participants to make necessary arrangements, and provides all relevant details, including date, time, location/venue and contact persons.

- Placement of the project materials in the public domain is also accompanied by making available a register of comments and suggestions that can be used by any member of the affected community and public to provide their written feedback on the contents of the presented materials. As a rule, the register is made available for the entire disclosure period. Where necessary, a project representative or an appointed consultant should be made available to receive and record any verbal feedback in case some beneficiaries experience a difficulty with providing comments in the written form.
- Drafting an agenda for the consultation meeting is an opportunity to provide a clear and itemized outline of the meeting's structure, sequence, chairpersons, a range of issues that will be discussed and a format of the discussion (e.g. presentation/ demonstration followed by a Questions & Answers (Q&A) session, facilitated work in small groups, feature story and experience sharing, thematic sessions with a free speaking format enabling the exchange of ideas). A clearly defined scope of issues that will be covered at the meeting gives the prospective participants an opportunity to prepare their questions and comments in advance. It is essential to allocate enough time for concluding Q&A session at the end of any public meeting or a hearing. This allows the audience to convey their comments and suggestions that can subsequently be incorporated in the design of the project. Keeping a record of all public comments received during the consultations meetings enables the project's responsible staff to initiate necessary actions, thereby enhancing the project's overall approach taking into consideration the stakeholders' priorities. The recorded comments and how they have been addressed by the project becomes an appropriate material for inclusion in the project's regular reporting to the stakeholders.
- Distribution of targeted invitations to the consultation meeting or a hearing is an important element of the preparation process and is based on the list of participants that is compiled and agreed in advance of the consultation. Invitations may be sent both to certain individuals that have been specifically identified as relevant stakeholders (e.g. representatives of authorities, leaders of local NGOs and initiative groups, village chairpersons) and as public invitees (e.g. addressed to initiative and professional bodies, local organizations, and other public entities). Text of individual invitations can be tailored to reflect the specifics of an invitee and their role in the process, whereas the text of public invitations normally indicates ~~general~~ details. Means of distributing the invitations should be appropriate to the customary methods of communication that prevail locally in the Project Area of Influence (PAI). Depending on the availability and technical feasibility, the following means of distribution can be used: direct mail (post); as an inclusion with other existing public mailings, utility bills, or circulars from a local authority. The invitation should typically contain a clear request for confirmation of the participation, also specifying a date by which the confirmation is expected. All invitations that were sent out are tracked to determine and manage the response rate. If no

response has been received, the invitation can be followed up by a telephone call or e-mail where possible.

- The vulnerable or marginalized groups of people, as clearly spelt out under section 2.5 above, will need to be targeted using unique approaches. Reaching them will require that their leadership is engaged first. With the support of their leaders, it will be easier to meet them through organized meetings closer to their communities. It should be noted that the language of communication is strictly observed to be spoken and understood by most of these categories of people. Similarly, the timing of the meetings should be arranged to coincide with that of both men and women, the youth and other significant categories of the community members are included.

NUSAF IV/TST will use a range of techniques to fulfill the main purpose of its consultation activities aimed at raising the community's and stakeholder awareness about the planned and current activities undertaken by the project, as well as to solicit public feedback that can subsequently be input into the project's mitigation and enhancement measures. As discussed above, due consideration will be given to the cultural appropriateness and inclusiveness of the consultation settings as well as gender and other sensitivities that may prevail in the local communities. Knowledge and advice of the community representatives and local NGOs are invaluable to ensure that these aspects are fully observed. If deemed necessary, separate meetings and focus group discussions will be held, as described above.

An attendance list is made available at the commencement of the consultation/hearing to record all participants who are present at the meeting and their affiliation. Wherever possible, attendees' signatures should be obtained as a proof of their participation. Details of the attendees who were not initially on the list (e.g. those participating in place of somebody else, or general public) should be included in addition to those who have registered for the meeting in advance.

In most cases and as a general practice, the introductory initial part of the meeting or a hearing should be delivered in a format that is readily understandable to the audience of lay persons and should be free of excessive technical jargon. If necessary, preference should be given, whenever possible, to the oral and visual methods of communication (including presentations, pictorials, illustrations, graphics and animation) accompanied by hand-out materials imparting the relevant information in understandable terms rather than as text laden with technical intricacies. Where technical specifics of the project's particular activities or solutions are required to be delivered in a greater level of detail, it will be ensured that the information conveyed remains comprehensible to all members of the audience and that the description of complex technicalities is adapted to their level of understanding, thereby enabling productive feedback and effective discussion.

If a large audience is expected to attend a public meeting or a hearing, necessary arrangements will be made to ensure audibility and visibility of the presentation and any demonstrations involved. This includes provision of a microphone, proper illumination, projector, places allocated for the wheelchair users, etc.

Taking records of the meeting is essential both for the purposes of transparency and the accuracy of capturing public comments. At least three ways of recording may be used, including:

- Taking written minutes of the meeting by a specially assigned person or a secretary;
- Audio recording (e.g. By means of voice recorders); and
- Photographing.

The latter should be with consent from attendees and implemented with a reasonable frequency throughout the meeting, allowing notable scenes to be captured but at the same time not distracting or disturbing the audience excessively. Where feasible, the video recording may also be undertaken but also with consent from the attendees. A combination of these methods assures that the course of the meeting is fully documented and that there are no significant gaps in the records which may result in some of the important comments received from the stakeholder audience being overlooked.

As a possible option in addition to the Q&A session close to the end of the public meeting/hearing, evaluation (feedback) forms may be distributed to participants to give them an opportunity to express their opinion and suggestions on the project. This is particularly helpful for capturing individual feedback from persons who may have refrained from expressing their views or concerns in the public.

Questions provided in the evaluation form may cover the following aspects:

- Participant's name and affiliation (these items are not mandatory if the participant prefers to keep the form confidential)
- How did they learn about the Project and the consultation meeting?
- Are they generally in favour of the Project?
- What are their main concerns or expectations/hopes associated with the Project, or the particular activity discussed at the meeting?
- Do they think the Project will bring some advantages to their community as a whole?
- Is there anything in the Project and its design solutions that they would like to change or improve?
- Do they think that the consultation meeting has been useful in understanding the specific activities of the Project, as well as associated impacts and mitigation measures? What aspects of the meeting they particularly appreciated or would recommend for improvement?

Bearing in mind that some of the participants might find completion of the evaluation form challenging due to the literacy constraints or concerns about their confidentiality, the distribution of the feedback forms should always be explained that filling the form is optional. Some persons may be willing to express their feedback verbally and in this case a member of Project staff will be allocated to take notes.

A summary description of the engagement methods and techniques that will be applied by project developer is provided in Table 5 below. The summary presents a variety of approaches to facilitate the processes of information provision, information feedback as well as participation and consultation.



**Table 5: Engagement Methods for Various Target Groups**

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups
<b>Information Provision</b>				
Distribution	Used to convey information on the Project and regular updates on its progress to local, regional and national stakeholders.	Printed materials present illustrative Presented contents are concise and adapted to a layperson reader. Graphics and pictorials are widely used to describe technical aspects.  Information may be presented both in the local languages (spelt out by region under Section 3.4 above) for local stakeholders, and in English for national and international audience.	Distribution as part of consultation meetings, public hearings, discussions and meetings with stakeholders, as well as household visits in remote areas.  Placement at the offices of local administrations and NGOs, libraries and other public venues.	Households in Project area
Distribution	A newsletter or an update circular sent out to Project stakeholders on a regular basis to maintain awareness of the Project development.	Important highlights of Project achievements, announcements of planned activities, changes, and overall progress.	Circulation of the newsletter or update sheet with a specified frequency in the Project Area of Influence, as well as to any other stakeholders that expressed their interest in receiving these periodicals.  Means of distribution – post, emailing, electronic subscription, delivery in person.  The mailed material can be accompanied by an enclosed postage-paid comment/feedback form that a reader can fill in a return to the Project’s specified address.	Households in Project Area of Influence.  Public venues in Project Area of Influence – local authority offices, libraries.  Residents in project area
Printed advertisements	Inserts, announcements, press releases, short articles or feature stories in the printed media – newspapers and	Notification of forthcoming public events or commencement of specific Project activities.	Placement of paid information in local, regional and national printed media, including those intended for general	Residents in project area

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups
	magazines	General description of the Project and its benefits to the community.	reader and specialized audience	
Radio or television entries	Short radio programmes, video materials or documentary broadcast on TV.	Description of the Project, Project development updates, solutions for impact mitigation.  Advance announcement of the forthcoming public events or commencement of specific Project activities.	Collaboration with media producers that operate in the region and can reach local audiences.	Residents in project area
Visual presentations	Visually convey Project information to affected communities and other interested audiences.	Description of the Project and related solutions/ impact management measures.  Updates on Project development.	Presentations are widely used as part of the public hearings and other consultation events with various stakeholders.	Affected communities in the project area, participants of the public hearings, consultations, rounds tables, focus group discussions and other forums attended by Project stakeholders.  Authorities and other governmental bodies.
Notice boards	Displays of printed information on notice boards in public places.	Advance announcements of the forthcoming public events, commencement of specific Project activities, or changes to the scheduled process.	Printed announcements and notifications are placed in visible and easily accessible places frequented by the local public, including libraries, village cultural centres, post offices, shop, local administrations.	Directly affected communities in the project area
<b>Information Feedback</b>				
Information repositories accompanied by a feedback mechanism	Placement of Project-related information and printed materials in dedicated/designated locations that also provide visitors and readers with an opportunity to leave their comments in a feedback register.	Various Project-related materials, ESMF documentation, environmental and social action plans.	Deposition of materials in publicly available places (offices of local NGOs, local administrations, libraries) for the duration of a disclosure period or permanently. Audience are also given free access to a register of comments and suggestions.	Directly affected communities in the project area.
Dedicated telephone	Setting up a designated and manned telephone line that can be used by the public to obtain information, make enquiries, or provide	Any issues that are of interest or concern to the local communities and other stakeholders.	Telephone numbers are specified on the printed materials distributed to Project stakeholders and are mentioned during public meetings.	Local communities within the Project Area of Influence.

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups
	<p>feedback on the Project.</p> <p>Initially, telephone numbers of Project's specialized staff can be shared with the public, particularly staff involved in SE, public relations and environmental protection.</p>		<p>Project's designated staff should be assigned to answer and respond to the calls, and to direct callers to specialist experts or to offer a call-back if a question requires detailed consideration.</p>	
Internet/Digital Media	<p>Launch of Project website to promote various information and updates on the overall Project, impact assessment and impact management procurement, employment opportunities, as well as on Project's engagement activities with the public.</p> <p>Web-site should have a built-in feature that allows viewers to leave comments or ask questions about the Project.</p> <p>Website should be available in two languages commonly used locally as specified by region under Section 3.4 above in project area) and in English for both local and international stakeholders.</p>	<p>Information about Project operator and shareholders, Project development updates, health and safety, community relations, community updates, employment and procurement, environmental and social aspects.</p>	<p>A link to the Project website should be specified on the printed materials</p> <p>Other on-line based platforms can also be used, such as web-conferencing, presentations, web-based meetings, Internet surveys/polls etc.</p> <p>Limitation: Not</p>	<p>Affected communities, Project stakeholders and other interested parties that have access to the internet resources.</p>

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups
Surveys, Interviews and Questionnaires	The use of public opinion surveys, interviews and questionnaires to obtain stakeholder views and to complement the statutory process of public hearings. The teams conducting these public hearings should be mindful of the language factor as used in the locality (ref. section 3.4 above)	Description of the proposed Project and related solutions/impact management measures. Questions targeting stakeholder perception of the Project, associated impacts and benefits, concerns and suggestions.	Soliciting participation in surveys/interviews with specific stakeholder groups or community- wide. Administering questionnaires as part of the household visits.	Directly affected households in the Project Area of Influence. Other communities within the Project Area of Influence. Special attention should be taken to make the participation of the vulnerable groups as a matter of priority.
Feedback & Suggestion Box	A suggestion box can be used to encourage residents in the affected communities to leave written feedback and comments about the Project.  Contents of the suggestion box should be checked by designated Project staff on a regular basis to ensure timely collection of input and response/action, as necessary.	Any questions, queries or concerns, especially for stakeholders that may have a difficulty expressing their views and issues during public meetings.	Appropriate location for a suggestion box should be selected in a safe public place to make it readily accessible for the community.  Information about the availability of the suggestion box should be communicated as part of Project's regular interaction with local stakeholders.	Directly affected households in the Project Area of Influence. Other communities within the Project Area of Influence, especially the poor and the VMGs members of the communities in the project areas.
<b>Consultation &amp; Participation</b>				
Public hearings	Project representatives, the affected public, authorities, regulatory bodies and other stakeholders for detailed discussion on a specific activity or facility that is planned by the Project and which is subject to the statutory expert review.	Detailed information on the activity and/or facility in question, including a presentation and an interactive Questions & Answers session with the audience.	Wide and prior announcement of the public hearing and the relevant details, including notifications in local, regional and national mass media. Targeted invitations are sent out to stakeholders.  Public disclosure of Project materials and associated impact assessment documentation in advance of the hearing.	Directly affected communities in the Project Area of Influence. Other communities within the Project Area of Influence, including the poor, other VMGs in the project areas of influence. Residents in the Project Area of Influence

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups
			Viewers/readers of the materials are also given free access to a register of comments and suggestions that is made available during the disclosure period	
Household visits	Household-level visits can be conducted to supplement the statutory process of public hearings, particularly to solicit feedback from community members and vulnerable persons who may be unable to attend the formal hearing events.	Description of the Project and related solutions/impact management measures.  Any questions, queries or concerns, especially for stakeholders that may have a difficulty expressing their views and issues during formal community-wide meetings.	Visits should be conducted by Project's designated staff with a specified periodicity.	Directly affected in the Project Area of Influence. The households of the poor and vulnerable and marginalized group members of the community should
Focus Group Discussions and Round Table Workshops	Used to facilitate discussion on Project's specific issues that merit collective examination with various groups of stakeholders.	Project's specific activities and plans, design solutions and impact mitigation/management measures that require detailed discussion with affected stakeholders.	Announcements of the forthcoming meetings are widely circulated to participants in advance. Targeted invitations are sent out to stakeholders.	Directly affected households in the Project Area of Influence, youth, elderly, women, and other VMGs. Their leaders and representatives should be specifically targeted for invitation to be part of the members in such group discussions.
Information centres and field offices	Project's designated venue for depositing Project-related information that also offers open hours to the community and other members of the public, with Project staff available to respond to queries or provide clarifications.	Project-related materials.  Any issues that are of interest or concern to the local communities and other stakeholders.	Information about the info centre or a field office with open hours for the public, together with contact details, is provided on the Project's printed materials distributed to stakeholders, as well as during public meetings and household visits.	Directly affected communities in the Project Area of Influence and any other stakeholders and interested parties.

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups
Site Tours	<p>Visits to Project Site and facilities organized for local communities, authorities and the media to demonstrate Project solutions.</p> <p>Visitors are accompanied by the Project's staff and specialists to cover various aspects and to address questions arising from the public during the tour.</p>	<p>Demonstration of specific examples of Project's design solutions and approaches to managing impacts.</p>	<p>Targeted invitations distributed to selected audience offering an opportunity to participate in a visit to the Project Site.</p> <p>Limitation: possible safety restrictions on the site access during active construction works.</p>	<p>Local communities within the Project Area of Influence.</p> <p>Elected Officials.</p> <p>Media groups.</p> <p>NGOs and other initiative groups.</p>

### 1.10 Stakeholder Categorisation

For the purposes of effective and tailored engagement, stakeholders of the proposed Project can be divided into the following core categories:

- **Affected Parties** – persons, groups and other entities within the Project Area of Influence (PAoI) that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures.
- **Other Interested Parties** – individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way; and
- **Vulnerable or marginalized individuals or groups following the enactment of the AHA** – persons who may be disproportionately impacted or further disadvantaged by the Project as compared with any other groups due to their vulnerable status<sup>1</sup> and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the Project.

Engagement with all identified stakeholders will help ensure the greatest possible contribution from the stakeholder parties toward the successful implementation of the Project and will enable the Project to draw on their pre-existing expertise, networks and agendas. It will also facilitate both the community's and institutional endorsement of the Project by various parties. Access to the local knowledge and experience also becomes possible through the active involvement of stakeholders.

#### 1.10.1 Affected Parties

Affected Parties include local communities, community members and other parties that may be subject to direct impacts from the Project during project activities. Specifically, the following individuals and groups fall within this category:

- Communities in the vicinity of the project's planned activities;

- The local population and local communes;
- Residents, business entities, and individual entrepreneurs in the area of the project that can benefit from the employment, training and business opportunities;
- Government officials, including district, municipal administration in the project area, village administrations, environmental protection authorities;
- Community-Based Groups (CBOs) and Non-Governmental Organizations (NGOs) that represent residents and other local interest groups, and act on their behalf; and
- NUSAF IV employees and contractors.

Local NGOs and initiative/advocacy groups represent the considerable capacity that the Project may tap for disseminating the information and raising awareness of the planned activities among the potentially affected communities in the project area. NGOs typically have well established interaction with the local communities, can propose the most effective and culturally appropriate methods of liaising based on the local customary norms and prevailing means of communication and possess the facilitation skills that may be utilized as part of the project's consultations. In addition, NGOs may lend assistance in disseminating information about the proposed Project to the local communities, including in the remote areas (e.g. by placing information materials about the project in their offices, distributing the project information lists during events that they are organizing), and provide venues for the engagement activities such as focus-group discussions.

#### **1.10.2 Other Interested Parties**

The projects' stakeholders also include parties other than the directly affected communities, including:

- Residents of the other rural settlements within the project area, who can benefit from employment and training opportunities stemming from the project;
- Civil society groups and NGOs on the national and local levels that pursue environmental and socio-economic interests and may become partners of the project. Organizations within this group are likely to be located outside the project's Direct Area of Influence;
- Business owners and providers of services, goods and materials within the project area that will be involved in the project's wider supply chain or may be considered for the role of project's suppliers in the future;
- GoU – government officials, permitting and regulatory agencies at the national and regional levels, including environmental, technical, social protection and labor authorities.
- Mass media and associated interest groups, including local, regional and national printed and broadcasting media, digital/web-based entities, and their associations.

#### **1.10.3 Vulnerable or marginalized individuals or Groups**

A significant factor in achieving inclusiveness of the engagement process is safeguarding the participation of vulnerable individuals or groups in public consultations and other engagement forums established by the project. The vulnerability may be varied and usually stemming from person or group's origin, gender, age, health condition, economic deficiency and financial insecurity, disadvantaged status in the community (e.g. minorities or fringe groups), dependence on other individuals or natural resources, etc.

Engagement with the vulnerable or marginalized individuals or groups often requires the application of specific measures and assistance aimed at the facilitation of their participation in the project-related decisionmaking so that their awareness of and input to the overall process are matching with those of other stakeholders.

Within the Project Area of Influence, the vulnerable individuals or groups may include and are not limited to the following:

- Elderly people and veterans of war;
- Persons with disabilities and their careers;
- Low-income families dependent on state support;
- Women-headed households or single mothers with underage children;
- The unemployed persons, including the youth.
- Individuals or groups who may be targets of discrimination
- VMGs or ethnic minorities, namely the IK, TEPETH, and BENET

Vulnerable or marginalized individuals or groups following the enactment of the AHA within the communities affected by the Project will be further confirmed and consulted through dedicated means, as appropriate. Description of the methods of engagement that will be undertaken by the Project is provided in the following sections.

This section describes SE activities that will be implemented by NUSAF IV going forward, including activities tailored to the specific project phases/developments as well as the on- going routine engagement.

#### **1.11 Consultation with Disadvantaged or Vulnerable and Marginalized individuals or Groups**

Disadvantaged/vulnerable individuals and groups are also those who may not have a voice to express their concerns or understand the impacts of the Project and are sometimes excluded from engagement and /or project benefits. The project will consider engagement approaches to ensure participation of those who represent the interests of vulnerable individuals or groups activities, policy development, studies etc. Vulnerable groups include pastoralists, women (including female headed households), Internally Displaced Persons (IDPs), and indigenous communities. These groups may have distinct livelihoods activities and be more vulnerable to shocks within food systems.

The OPM, the NUSAF IV Safeguards Preparation Team undertaking Project preparation, the NGOs in the project areas, the contractors or sub-contractors as well as consultants shall make sure their representatives understand who the vulnerable and marginalized individuals or groups may be. This will enable them to adapt their communication approaches during the Project design and planning and implementation processes. Additionally, if there are no organizations active in the project areas that work with vulnerable groups, such as persons with disability/ concerns as well as indigenous groups, among others, contact personnel such as cultural, religious leaders or elders, who may be more aware of marginalized groups and how best to communicate with them shall be identified and consulted.



### 1.12 Stakeholder Needs

The above stakeholders will play an important role in the management and implementation of the project activities. Implementing partners will play a key role in the overall institutional structure and arrangements of the platform, through either jointly implementing the activities with OPM or acting as sources of information and technical capacity. The Table below describes the key characteristics, specific needs and communication means for major stakeholders.

**Table 6: Summary of Project Stakeholder Needs**

Community	Stakeholder group	Key characteristics	Language needs	Preferred notification means <sup>11</sup>	Specific needs <sup>12</sup>
World Bank Team	Task team leader, Country manager and technical officers	Consists of high-level technical representatives with knowledge and skills about the project	English	Email, telephone calls, meetings (face-to-face or virtual)	Public and virtual consultations with meetings translation
UN Agencies and other development partners	UNHCR, WFP, UNICEF, NUSAF IV IPs and Service providers	Formulate and implement regional interventions, policies and strategies	English	Translated letter, shared electronic documents (reports) via mail, phone call for follow up, leaflets/informative notes	Project roles and responsibilities, support in SEs, information generation and dissemination. Regular formal and informal meetings
Ministries, Departments and Agencies (MDAs) including Parliament	MPs from Project Areas; Ministries: MoFPED, MTIC, MAAIF, MoGLSD, MWE, MoH and MoLG Departments and Agencies: NEMA, NFA, NPA, EOC, OWC, NARO, UBOS, IG and Academia	Knowledge generation and documentation	English	Email, telephone calls, meetings (face-to-face or virtual)	Project progress, project preparation and implementation, other SEs, joint control and management efforts, experience sharing Regular formal and informal meetings
NGOs/CBOs	National, District and community based organizations in the project areas	Organizations working in the districts on thematic areas similar to the NUSAF IV projects and also cover the same geographical areas	English/Local widely used language (Refer to section 3.4 above)	Email, telephone calls, meetings (in person or virtual)	Project progress, project preparation and implementation, other SEs, joint control and management efforts, experience sharing Regular formal and informal meetings
Media	Radio and TV stations, international media, OPM websites and social media page	Wide regional and global coverage that can be utilised for Awareness creation and visibility	English/Local widely used language	Email, telephone calls, meetings (face-to-face or virtual)	Alerts, press releases, project reports and events Periodic meetings with media channels

<sup>11</sup> e-mail, phone, radio, letter

<sup>12</sup> Needs in terms of accessibility, large print, childcare, daytime meetings

Community	Stakeholder group	Key characteristics	Language needs	Preferred notification means <sup>11</sup>	Specific needs <sup>12</sup>
Academic, Research and Scientific Institutions	Individuals and institutions	Scientific understanding of the range or problems associated with the proposed Project Scientific approach to the relevant issues. Possible specialists' provision for further activity in project implementation.	English	Email, telephone calls, meetings (face-to-face or virtual)	Information generation and dissemination in areas critical to NUSAF IV project
Business community / Private sector	Service Providers	Economically interested business entities (conclusion of contracts, economic damage due to competition, etc.); they can be also potential customers of the project developer.	English	Email, telephone calls, meetings (face-to-face or virtual)	
Local communities/settlements	Affected persons, other interest groups and the vulnerable groups and refugees	Affected communities and other interested parties potential vulnerable groups living in and close to the project areas	Local widely used language	Posters in strategic areas in the community, visit with translator and civil society representative or Project focal point from Area local leader (preferably woman representative) Written information such as flyers, fact sheets and posters in strategic areas in the community,	Graphic/visual illustrations for the engagement Timing of the engagement, Logistical needs to attend meeting

## 2 Brief Summary of Previous Stakeholder Engagement Activities

To date, a range of stakeholder consultations in relation to profiling of the project as well as design features and implementation modalities have taken place. Notably, the regional NUSAF3 Project performance review was carried out in each of the 8 sub regions implementing the project and coupled with a consultation on the proposed successor project (NUSAF IV) that took place in March 2021 and covered all the targeted sub regions of; Bukedi, Elgon, Teso, Karamoja, Lango Acholi, West Nile, Busoga and Bunyoro. Participants of these meetings were elected political leaders, honorable Members of Parliament, members of EALA and various technical officers. These meetings helped to engage leaders on implementation status of NUSAF3; consult on prospects of NUSAF IV; as well as build the much-needed work relationship amongst political leaders and technical staff. The stakeholders gave their

reflections and views on lessons from NUSAF3 generally, as well as insights to specific regional development challenges and aspirations which the successor NUSAF IV should focus on, including key considerations for implementation modalities.

In 2022, the Project design team also held several consultative meetings with various key MDAs on pertinent issues in line with the profiling of the project. Key among these were meetings held with Ministry of Local Government (MoLG) PDM Secretariat in April 2022; Ministry of Finance, Planning and Economic Development (MFPED) Development Committee in May 2022; then with key private sector representatives and financial inclusion institutions and service providers in May 2022. During each of these successive meetings stakeholders made pertinent inputs into the project profile which culminated into the final project profiling meeting held in August 2022.

Additionally, critical consultations were made during the project joint GOU-WB identification mission of April 2022 during which all the key MDAs and a range of Development Partners (WFP, UNHCR, UNICEF, WB), among others, still provided detailed input on design features. The major issues raised included Emphasis on climate smart LIPW activities which should largely relate to environment regeneration plus soil and water conservation such as tree planting and growing, terracing of degraded hilly areas among others. The mission also recommended expansion of the DRF into the Kyoga catchment area to address floods that are characteristic of the area, as well as maintaining drought as a major risk factor which should be considered as a key DRF trigger in Karamoja area. The coverage should also be extended to districts bordering Karamoja so as to address water for production requirements specifically for livestock and these districts are; Agago, Kitgum, Lamwo, Otuke, Katakwi, Amuria, Bukedea and Kapelebyong. Strong emphasis was placed on tree growing (Ensuring high survival rates) for ecological value. Additionally, was the need to extensively sensitize communities on consequences of environmentally negative traditional practices such as periodic bush burning, indiscriminate tree / vegetation clearance and poor management of water points.

Notably, the joint GOU-WB NUSAF IV preparation mission of September 2022 brought together key participating MDAs and a range of Development Partners (WFP, UNHCR, UNICEF and WB), etc. During this consultative meeting key design features and implementation were captured for inclusion in the design and implementation modalities.

During the period between late January and early February 2023, wider consultations were carried out at regional groupings with higher and lower local governments and communities in selected districts. OPM sent out teams to each of the targeted regions and these were grouped as Bunyoro and West Nile Busoga and south eastern, Karamoja and Teso, Elgon and Bukedi and Karamoja region in total about 1300 people consulted. In each of the selected districts lower-level consultations were arranged and conducted at sub county level. The targeted stakeholders at district level consultations included the district council members, Heads of department from line sectors (Finance and Administration, Community based services, Production, Natural Resources, Technical services and Health). NGOs and CBOs with activities in line with the project components were also invited to these consultations. At this level, meetings were arranged and carried out with stakeholders that included the sub county councils, sub county technical staff, parish development committees, community and opinion leaders and leaders of civil society organization with operations in the areas of jurisdiction. Details of these consultations are explained in Tables 3 and 4 of this SEP. Appendices 5 and 6, in addition provide detailed consultation minutes and issues raised during these consultations as deemed critical for inclusion in the design of the project, respectively.

### **3 Policy, Legal and Regulatory Frameworks**

This SEP is underpinned by the Uganda’s policy, legal and regulatory frameworks which guarantee the right to information and public participation. It is also supported by the World Bank ESF specifically ESS 10: Stakeholder Engagement and Information Disclosure. This section focuses on policy, legal and regulatory instruments relevant to SE. The ESMF explores the broader regulatory regime.

#### **3.1 The Uganda Policy Framework**

##### **3.1.1 The National Equal Opportunities Policy, 2006**

This policy translates Article 21 of the Constitution and other rights-sensitive provisions such as Articles 35 and 36 on the rights of persons with disabilities and the protection of minorities, respectively, with the aim of ensuring equal access to opportunities and prohibition of any kind of discrimination.

##### **3.1.2 Uganda National ICT Policy 2012**

One of the objectives of Uganda’s National ICT Policy is “to facilitate the broadest possible access to public domain information.” The policy is designed to support the attainment of this objective through several strategies, including conducting research to establish citizens’ information needs and the barriers to information use, and developing measures to overcome these barriers; and increasing accessibility to government information and ensuring uniform practices in its distribution.

##### **3.1.3 The National Land Policy, 2013**

The policy addresses contemporary land issues and conflicts facing the country. The vision of the policy is; “Sustainable and optimal use of land and land-based resources for transformation of Ugandan society and the economy”. The goal of the policy is: “to ensure efficient, equitable and sustainable utilization and management of Uganda’s land and land-based resources for poverty reduction, wealth creation and overall socio-economic development”. Among the issues it addresses is the need to mitigate the impacts of investments (such as those that will be identified under the NUSAF IV Project and sub-projects) on land to deliver equitable and sustainable development; and protect the land rights of citizens considering such investments, including the rights of vulnerable groups.

##### **3.1.4 The National Land Use Policy, 2011**

The aim of the policy is to: “achieve sustainable and equitable socio-economic development through optimal land management and utilization”. This Policy will have similar applicability as the one in the preceding paragraph, and as the Land Act, 1998, Cap 227; and the Land Acquisition Act, 1965 in the preceding section.

##### **3.1.5 The Uganda National Culture Policy (2006)**

This Policy seeks to promote community action on cultural practices that promote and that impinge on human dignity. It provides guidance on any development to avoid impingement on the culture of vulnerable and marginalized persons’ The NUSAF IV project will collaborate with the Department of Culture in ensuring proper preservation of positive cultural practice with the VMG communities.

##### **3.1.6 The National Equal Opportunities Policy 2006**

The policy objectives amongst others are geared towards guiding the planning processes, affirmative action, and implementation of programs and allocation of resources to all stakeholders. It also seeks to empower the marginalized and vulnerable groups for their full participation in all development processes. It is noted that, discrimination and stigmatization may serve as a barrier for the indigenous and marginalized in selected project areas to accessing employment such as training and casual labor required during the carrying out of land demarcation, therefore this policy will act as a guiding principle

to ensure that all groups are included in the planning and implementation process.

## **3.2 The Uganda Legal Framework**

### **3.2.1 The Constitution of the Republic of Uganda, 1995 (as amended)**

The Constitution of the Republic of Uganda, as the supreme law, provides for and guarantees public participation in government activities and programs as one of its core pillars and a constitutional right. Amongst its Fundamental and other human rights and freedoms, the Constitution provides that the State shall guarantee and respect institutions which are charged by the State with responsibility for protecting and promoting human rights by providing them with adequate resources to function effectively. In addition, the right to access information is enshrined in Article 41 of the Constitution which provides that every citizen has a right of access to information in the possession of the state or any other organ of the state except where the release of the information is likely to interfere with the security of the state or the right to the privacy of any other person.

The Constitution under Article 243 provides for land tribunals which is entrusted in Section (2) with jurisdiction over (a) “the determination of disputes relating to the grant, lease, repossession, transfer or acquisition of land by individuals, the Uganda Land Commission or other authority with responsibility relating to land”; and (b) “the determination of any disputes relating to the amount of compensation to be paid for land acquired.”

“Article 21 of the Constitution of Uganda (1995) provides for the right to equality and freedom from discrimination. It states that: (1) All persons are equal before and under the law in all spheres of political, economic, social and cultural life and in every other respect and shall enjoy equal protection of the law”.

### **3.2.2 The Access to information of Act, 2005**

The Access to Information Act of 2005 highlights the constitutional guarantee of access to information by determining the scope of citizen rights and the obligations of information offices in all public bodies. It prescribes the procedures for obtaining access to information and making complaints against a refusal to release information. In principle, the Act applies to information and records of all government bodies at the national, regional and local levels. It does not apply to cabinet records and the records of court proceedings before the conclusion of a given case. The Act explicitly recognizes the link between the provision of timely, accessible and accurate information and transparent, accountable and participatory governance. In all, the Act was enacted to promote the right to access to information, promote an efficient, effective, transparent and accountable Government and to enable the public to effectively access and participate in decisions that affect them as citizens of the country.

### **3.2.3 The Local Government Act, 1997**

This Act provides for a decentralized governance and devolution of central government functions, powers and services to local governments that have their own political and administrative set-ups.

The Act provides for local governance structures that are based on local councils and the participation of community members in which powers over development planning, budgeting, financial management, human resources, and service provision function (including safety and security service delivery needs) have been devolved to popularly elected Local Governments.

Throughout the life cycle of the Project, the Act will guide in identifying and planning for meaningful engagements, consultations and involvement of relevant local government stakeholders, community

leaders and members. Preceding the preparation of this SEP was an extensive mapping of stakeholders to ensure inclusive public involvement and participation.

The respective district local governments in the selected project areas will be consulted and involved in mobilizing project beneficiaries and in the implementation and monitoring of project activities within their areas. As the project further evolves, more stakeholders will be identified and involved as per the prevailing needs and requirements of different projects.

### **3.2.4 Land Act**

Largely, the Act addresses four issues namely, holding, control, management and dispute resolution. As regards tenure, the Act repeats in Section 3, provisions of Article 237 of the Constitution which vests all land in the citizens of Uganda, to be held under customary, freehold, mailo and leasehold tenure systems. It then defines the incidence of each tenure regime (section 4); provides mechanisms of acquisition of certificates of customary ownership (sections 5-9); the conversion of customary tenure to freehold (sections 10-15), or collective management of land held under customary law (sections 16-27); the protection of the rights of women, children and persons with disability (sections 28); the conversion of leasehold into freehold (section 29) and the security of tenure for ‘tenants by occupancy’ (sections 30-39).

Provisions regarding land administration (referred to in the Act as “management”) are adequately detailed. The Act creates a series of land administration institutions consisting of Parish Land Committees, District Land Boards and Uganda Land Commission (ULC). Each of these entities is largely autonomous of one another and is entrusted with functions that range from the holding of lands not subject to private ownership, management of land thus held, processing applications for various grants and certificates, registration and transfer of interest in land (sections 47-74).

The Land Act provides for a decentralized system to resolve land disputes in Uganda (sections 75-90) through establishment of Land Tribunals at all levels of local government and that they should first arbitrate land disputes before resorting to legal courts of law. No other organ, except informal traditional authority mediators (section 89) will henceforth have jurisdiction over land disputes (section 98). Thus, the Act favors local landowners by advancing a process that is localized and free from costs or formalities associated with formal judicial courts.

### **3.2.5 The National Environment Act, 2019**

The National Environment Act, 2019 (NEA, 2019) among other objectives, provides for the use and management of the environment for sustainable development. It provides for strategic environmental assessment and addresses emerging environmental management issues.

All NUSAF IV activities will be conducted in consultation with the provisions of the NEA, 2019 especially with respect to requirements for ESIA and/or audits.

## **3.3 The Uganda Regulatory Framework**

### **3.3.1 The Public Order Management Act, 2013**

The Act regulates public order, ensuring that public gatherings and assemblies have been permitted under the law and adhere to safety measures prescribed or agreed upon in consultation with law enforcers. It also stipulates the importance of ensuring that information disclosures under the Project are tailored to the sociocultural and economic needs of a given community. The Act prescribes the

manner in which consultations should be carried out. In Uganda's politically charged environment, project implementers will endeavor to ensure that public meetings, consultations or any other SE exercise adhere to prescribed regulations and prioritize the safety of stakeholders.

### **3.3.2 Guidelines for Environmental Impact Assessment in Uganda, 1999**

According to these Guidelines, during the ESIA process, its scoping phase to the extent possible, involves consultations with potentially affected communities, relevant government agencies, representatives of other interested parties including NGOs, private sector, independent experts and all other stakeholders including the public. This exercise will include meetings to obtain the stakeholders' comments on what should be included in the study, amongst others.

### **3.3.3 Social Safety and Health Safeguard Guidelines, 2020**

The Guidelines provide direction to all stakeholders on how to prevent, mitigate and respond to social, safety and health risks during planning, design, implementation, monitoring and evaluation, of programmes and projects at Local Government level. NUSAF IV is an affirmative action that will address socio economic disparities and underdevelopment right from household level in all the targeted eight (8) sub regions of the country.

### **3.3.4 The Covid-19 Guidelines**

Following the outbreak of the Covid-19, the GoU, through the Ministry of Health, adopted strict containment and mitigation measures, guidelines and Standard Operating Procedures (SOPs) against the pandemic on ad hoc basis. The measures, guidelines and SOPs have been updated and adjusted from time to time in response to the changing Covid-19 situation in the country. These measures and guidelines vary across the country with different districts, cities or municipalities having different protocols. During the life cycle of the Project, the implementing agencies, local leaders and other stakeholders will ensure strict adherence the prevailing measures, guidelines and SOPs to ensure the general protection and safety of everyone.

## **3.4 Regional Conventions on Access to Information**

### **3.4.1 The African Charter on Human and Peoples' Rights (ACHPR)**

At regional level, the right to access information is enshrined in Article 9 of the African Charter on Human and Peoples' Rights (ACHPR). Article 9 of the ACHPR states: "Every individual shall have the right to receive information and the right to express and disseminate his/her opinions within the law."

## **3.5 International Conventions on Access to Information**

### **3.5.1 Principle 10 of the 1992 Rio Declaration**

Environmental issues are best handled with the participation of all concerned citizens at the relevant level. At the national level, everyone shall have appropriate access to information concerning the environment that is held by public authorities, including information on hazardous materials and activities in their communities, and the opportunity to participate in decision-making processes. State actors shall facilitate and encourage public awareness and participation by making information widely available.

### **3.5.2 Universal Declaration of Human Rights**

Access to information is a fundamental human right recognized by international human rights instruments, including Article 19 of the Universal Declaration of Human Rights, which provides that everyone has the right to freedom of opinion and expression. This right includes freedom to hold



opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers.

### 3.5.3 Other conventions on rights to information

The right of access to information is further recognized by: Article 19 of the International Covenant on Civil and Political Rights; Articles 13 (1) and (17) of the Declaration on the Rights of the Child; Article 15 of the United Nations Declaration on the Rights of Indigenous People; and the United Nations General Assembly Resolution, 59 (1). In 2012, the United Nations also recognized access to the internet as an important tool for the promotion of the right of access to information, while 2016 was the first year that UNESCO marked September 28 as the International Day for Universal Access to Information (IDUAI). At the regional level, the right to access information is enshrined in Article 9 of the African Charter on Human and Peoples' Rights (ACHPR). Article 9 of the ACHPR states: "Every individual shall have the right to receive information and the right to express and disseminate his/her opinions within the law."

### 3.5.4 World Bank's Environmental and Social Standards

Specifically, the World Bank's ESS10 on Stakeholder Engagement and Information Disclosure recognizes the importance of open and transparent engagement between the Recipient and project stakeholders as an essential element of good international practice. This is because, effective SE can improve the environmental and social sustainability of projects, enhance project acceptance, and make significant contribution to successful project design and implementation. ESS 10 requires that SE should be an inclusive process conducted throughout the project life cycle. Where properly designed and implemented, it supports the development of strong, constructive and trusting relationship between implementing agencies and Project affected Persons (PAPs) that are important for the successful management of a project's environmental and social risks.

## 5. Stakeholder Engagement Program

This section indicates the stakeholder program that outlines the stakeholder communication Plan including when they will reach out to each stakeholder, what platform they will use, and how much information will be delivered

### 5.1 Purpose and timing of stakeholder engagement program

The overall goal of this SEP is to ensure a systematic, consistent, comprehensive and coordinated approach to stakeholder participation and communication throughout the project cycle. The SEP outlines ways in which the project team will communicate with stakeholders and feedback mechanism to be utilized. The plan will guide timely engagement with key stakeholders as well as dissemination and increased access to relevant project information. The project will innovate ways for consultations to be effective and meaningful to project and stakeholder needs while considering Covid-19 restrictions. Strategies to be employed include virtual and physical meetings, phone calls, and emails.

#### 5.1.1 Implementation Phase

Stakeholder engagement is an inclusive process that must be conducted throughout the project cycle. The key stakeholder's engagement activities to take place during the project preparation stage through implementation and closure are:

- a) **Implementation Phase:** At the official project launch meeting, the TST will invite the Project Steering Committee (PSC) to present the ToR of the Steering Committee and the project plan and

implementation arrangements. The interest of those key stakeholders is to help to steer the project through from start to completion, approving the Work Plans and Budget as well as providing inputs. Participation in the launch meeting will be extended to OPM representatives from other divisions and specialized institutions, other stakeholders like CSO, Development Partners (DP) etc. Two Steering Committee meetings per year or as agreed, either virtual or face-to-face, are foreseen for the project. In addition, to those planned meetings, any other meetings and workshops could be organized as needed.

In case of any stakeholder consultations meeting/workshops, either virtual or face-face, the TST will strive to provide relevant information to stakeholders with enough advance notice (10-15 business days) for stakeholders to adequately prepare and provide meaningful feedback. The TST will collect comments, review them and provide feedback to stakeholders on how those comments were incorporated, and justify why they were not considered within 10-15 working days from the stakeholder consultation event.

The electronic copies of the disclosure materials will be placed on the OPM and World Bank websites to allow easy access for all stakeholders. The OPM websites have an on-line feedback feature that will enable readers to leave their comments in relation to the information shared. The disclosure materials will also be shared with the targeted stakeholders through email, and during project related meetings/activities mainly for the stakeholders that lack internet services. In addition to disclosure of the various project materials (ESCP, SEP, PAD, ESMF etc.), formal channels will be put in place to register and document comments and suggestions from the public. These grievance arrangements shall be made publicly available to receive and facilitate resolution of concerns in relation to the Project.

**Table 7: Information disclosure plan**

Project stage	List of information to be disclosed	Communication channels	Target stakeholders	Timetable: location/date	Responsibilities
Preparation Phase	Project Concept note  ESF documentation that is required for disclosure by the WB  -SEP with GRM -ESMF -ESCP	Email, intranet, website, meetings	Project Design Team and implementing entities/divisions of OPM  - MDAs -District Local Governments	In person or virtual up to one month after project effectiveness	OPM/Design Team
Project Launch	-Project information document -key activities, work plan -Implementation modalities -Key elements of ESCP, ESMF and SEP with GRMs EISM Hotline	Shared via Email with an official invitation letter	Project Design Team and implementing entities/divisions of OPM and other stakeholders listed above	15 days before the meeting, all stakeholders will be informed and shared with them the key documents by email as 100% target.	OPM/TST

During implementation (after the launch)	Progress Reports on: -Activities -M&E framework - studies -ESIA plus audits ESMPs EISM Hotline	Via email Meetings	Project Implementation Support Team and implementing entities/divisions of OPM and other stakeholders listed above	Throughout the implementation period	OPM/TST
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## 5.2 Proposed strategy for engagement, including consultation

For the stakeholder consultation, as described in table below, the foreseen strategies will be through email, virtual and/or face-to-face workshops and meetings.

Once consultations have taken place, stakeholders will want to know which of their suggestions have been taken on board, what risk or impact mitigation measures will be put in place to address their concerns, and how, for example, project impacts are being monitored. Such feedback will be provided through the continuous engagements with the stakeholders.

**Table 8: Proposed strategy for stakeholder consultations**

Project stage	Topic of consultation	Method used	Timetable: Location and dates	Target stakeholders	Responsibilities
Preparation Phase	- Project design activities, SEP including <b>GESCP</b>	Virtual and face-to-face consultation meetings, documents shared via e-mails	During project preparation and formulation phase	TST and OPM entities	OPM/TST
Project Launch	Project 1 <sup>st</sup> year work plan with budget SEP including GRM and ESCP Project Design	Virtual and / or Face-to-face consultations meetings, documents shared via e-mails	Within 3 months after the project's effectiveness date	TST, OPM entities and PSC	OPM/TST
During implementation (after the launch)	-Progress reports -Policy issues at Higher level -SEP including GRM, ESCP, etc. if revisions are needed	Workshops/ meetings, e-mail for dissemination of documents	-Biannual meetings -As and when needs arise	PIU and OPM secretariat and entities	OPM/TST

## 5.3 Proposed strategy to incorporate the view of vulnerable or marginalized individuals or groups

Vulnerability refers to the conditions determined by physical, social, economic and environmental factors or processes, which increase the susceptibility of a community to the impact of hazards. A vulnerable group is therefore a population with specific characteristics that put it at a higher risk of falling into poverty or suffering than others living in project areas. Vulnerable groups thus include the

elderly, disabled people, HIV/AIDS infected and affected individuals (including children) and households, women, and orphans and vulnerable children (girl child, street children, children from extremely poor households, children with disabilities, children living with elderly or disabled parents, and children in paid employment). This definition also includes the three groups described above. On average, the Karamoja sub region is recognized as a vulnerable, marginalized and poor part of the country. Therefore, there is a thin line between the persons identified as vulnerable/marginalized and the entire population of the region. Details of strategies to engage the VMGs are discussed under section 2.4 above.

Some of the key factors that continue to affect and maintain the marginalization of VMGs communities include:

- (a) Dispossession of ancestral lands including lack of access and/or no control or legal recognition of such land and other natural resources.
- (b) A focus on modern agriculture versus preservation of livelihoods of hunter and gatherers and pastoralist groups.
- (c) Limited access to education, resulting in inability to compete for employment opportunities.
- (d) Ignorance and limited access to information on government programs and basic entitlements
- (e) Limited access to agricultural and other social services such as health, etc.
- (f) Unequal development of health care and other social infrastructure; and
- (g) Limited access to justice and increased conflict and a deteriorating security situation and recurrent inter-ethnic conflicts.
- (h) Limited access to livelihoods, financial, banking and credit facilities

The views of Vulnerable or Disadvantaged Groups (VDG) will be sought during the project implementation. In-depth analysis is required to fully understand who the VDG are and what are their issues related to specific elements of the Project to be implemented / advanced by OPM. Their interests will be reflected in any policy and/or strategy document developed during the implementation of the project, through engagement with these groups and or their representatives.

In conclusion, TST will emphasize the need to engage with and consider the views of VDGs in all Terms of Reference either for individual or firm consultancy services for policy assessments at the national level, policy and strategy development reports at the regional level as well as any other studies or assessments.

## 5.4 Timelines

The information on timelines for project phases and key decisions that was described above are:

### 3.5.5 Preparation Phase:

The OPM SEP was prepared before project appraisal and will be disclosed prior to appraisal. Whenever stakeholders raise concerns, two weeks (14 days) will be allowed to give comments and feedback. The Design Team will then have to synthesize all received comments for one week and send them back.

**Implementation Phase:** The launch event will take place within 3 months after the Project Effective Date.

During project implementation, it is foreseen to have a regular biannual meeting with the project steering committee. In addition, when needs rise, key stakeholders will be consulted in due time. All comments received during the consultation meetings/workshops will be finalized and shared to all participants at the events in a format of action items.

## **5.5 Review of Comments**

All written comments on reports will be sent by email to the stakeholders either with track changes or in form of text message/note. After receiving all stakeholders' comments within two weeks after the shared date, the TST will review and send them back within 7 working days. All oral comments during consultation meetings will be considered as an action item. This will be cleared by the TST on the last day of the mentioned organized event.

## 4 Resources and Responsibilities for Implementing the Stakeholder Engagement Activities

### 6.1 Resources

During the preparation phase, OPM Environment and Social Safeguards specialists with Technical Support from the World Bank were responsible for developing this SEP. The main deliverables are to provide and review the SEP, and ESCP documents. The rest of consultations process between partners, districts and OPM are only in a form of virtual meetings and via email.

The OPM will recruit an environmental Specialist and Social Specialist as well as Gender Specialist to join the Technical Support Team (TST) prior to the Project Effective Date, preferably 6 months prior to the implementation of activities. OPM staff will also provide support to the Project and will be responsible for ensuring implementation of the SEP and GRM throughout project implementation. Tables (9 and 10) below provide indicative budget summaries and details of implementation schedules and cost respectively.

**Table 9: Indicative Budget for the NUSAF IV SEP Implementation**

No.	Activities	Approx. Cost (USD)
1	Stakeholder consultation meetings at various levels (District, Regional and National Level)	70,000.00
2	Information products IEC materials e.g. brochures	66,000.00
3	Publicity/media	30,000.00
4	Capacity building	100,000.00
5	Monitoring and evaluation plus technical supervision	65,000.00
6	Engagement of Liaison Specialists/Officers in project areas	150,000.00
7	Grievance Redress Mechanism	150,000.00
<b>TOTAL</b>		<b>631,000.00</b>

### The Detailed SEP Implementation Plan

This section details the SEP arrangements and a budget for its implementation during the Project preparatory and implementation stages for safeguards instruments that include the ESMF and ESCP. Detailed budgets for the development and operationalization of the SEP and other specific sub-projects will be developed during the preparation of the SEP after the actual stakeholders have been identified and the dates, time and venues for consultations have been set and confirmed. The plan detailed herein therefore serves as a standard SEP that will be used across the entire NUSAF IV project to guide the development of the final NUSAF IV SEP which will entail only one SEP. This SEP will guide implementation throughout the project life cycle and will continually be updated if need be based on the project needs or issues arising.

Technical support team with a clear indicative budget and timeline for its implementation is proposed as hereunder.

**Table 10: Detailed stakeholder implementation schedule and budget**

<b>The SEP Implementation Schedule and Budget for the Project Implementation</b>							
	<b>Activity to Address Social and Environmental Risks</b>	<b>Steps to be taken</b>	<b>Timelines</b>	<b>Responsible Entity</b>	<b>Monitoring (Who will monitor)</b>	<b>Output Indicators</b>	<b>Estimated Budgets (USD)</b>
<b>1</b>	<b>Development of the SEP that will guide the process of stakeholder engagements</b>						
	Preparation, development and implementation of the project SEP shall follow established World Bank Policy on Environment and Social Safeguards and the relevant Ugandan laws. WB ESF WB ESS Ugandan Laws	<b>Social Issues:</b> Consultants shall be procured to handle social safeguard issues before, during and immediately after project implementation, undertake project awareness promotion, mobilization and sensitization of the beneficiaries and all key stakeholders.	Following the procurement and signing of the contracts by the Consultants.  Project design and document preparatory stage prior to the implementation.	OPM Project Staff, and procured consultants	WB OPM	- A number of consultants procured. - Social Safeguards documents prepared. - A number of WB policy documents and Ugandan legal frameworks on public disclosure reviewed. - SEP/draft report	30,000
<b>2</b>	<b>Stakeholder Mapping and assessment based on their influence and interest in the project</b>						
<i>a.</i>	Identification, categorization and profiling of stakeholders based on their interests and influences in the Project	Identify and conduct assessment of stakeholders to participate in SEs for the Project and contribute to project design Review profiles of stakeholders to establish their areas of expertise and relationship to the project. Review World Bank and	To be conducted in the first quarter on the onset of the implementation.	OPM PIUs Consultants.	WB OPM	- A number of stakeholders identified. - A number of stakeholders considered. - A number of stakeholders consulted. Stakeholder views documented.	20,000

		<p>OPM reports on the capacity/interests and services of proposed stakeholders</p> <p>Conduct field visits, if possible, to identify and map out key actors and stakeholders plus service providers on land related land issues in project area</p>					
b	Stakeholder consultations handled by qualified service provider/consultants /PIUs	<p>Develop standardized guides to be used as just guides but not to limit the discussion</p> <p>Procure qualified and knowledgeable service provider/ consultants to conduct the SEs</p> <p>Review guides for consistency, relevance and coherence with the SEP guideline.</p>	<p>To be conducted prior to the project implementation</p> <p>-Maintained throughout Project implementation to its conclusion</p>	OPM	WB; OPM	<p>- Safeguards consultants in place</p> <p>- Standardized guides developed to guide consultations</p>	25,000
c.	Stakeholder consultations	<p>Develop interview/ facilitation guides (all these are guides and should not limit the discussion)</p> <p>Conduct stakeholder meetings/FGDs/KIIs</p> <p>Conduct SE throughout the project</p> <p>Record/register stakeholder views and concerns and key emerging issues</p> <p>Prepare field visit reports</p>	<p>-Prior to initiating physical or online SE</p> <p>-Maintained throughout Project implementation</p> <p>-Stakeholder views collected</p>	PIUs Consultants	WB, OPM	A number of stakeholder consultations done	25,000
e	GBV/SEA referral	OPM will use the survival	-First quarter during	Consultants;	OPM in strong	- Referral pathway	20,000



	<p>pathway(s) in line with the National Systems and guidelines developed by MGLSD and adopted by OPM and incorporated into the SEP implementation process.</p>	<p>centered approach to handle grievances relating to GBV cases and also to undertake a review of the MGLSD guidelines for referral of GBV cases together with the police protocol on GBV<sup>13</sup></p> <p>On the basis of mapped GBV/SEA prevention and response service providers (comprised in the DPGs) develop/update a GBV referral list for service providers.</p> <p>Disseminate the referral pathway/list to stakeholders, DPGs, CLAs including service providers across the project implementation area.</p>	<p>implementation</p> <p>-Maintained throughout project implementation.</p>	<p>OPM PIUs</p>	<p>coordination with MGLSD, Districts and national systems. Together with the Development Partners' working group (DPG)</p>	<p>developed/updated</p> <p>- A number/type of GBV/SEA preventive and response services available.</p> <p>- A number of GBV referrals incidents to the project GRM recorded.</p>	
<b>3</b>	<b>Strengthen Institutional capacity for NUSAF IV Social and Environmental risk mitigation and response teams</b>						
a)	<p>Recruitment and deployments of competent Specialist and Officer</p>	<p>Recruitments and deployment of Specialist and Officer</p>	<p>Before commencement</p>	<p>OPM project Management</p>	<p>OPM</p>	<p>-Specialist and Officer deployed</p>	<p>120,000</p>
b)	<p>Enhance capacity of the existing OPM staff on social and environmental risks and safeguards mitigation including GBV to manage</p>	<p>Enhance the capacity of available OPM NUSAF IV staff and or Procure services of additional qualified and competent</p>	<p>In the first Quarter on the onset of implementation</p>	<p>OPM project Management</p>	<p>OPM</p>	<p>- Refresher training courses taken by OPM PIUs and staff</p> <p>- Level of capacity built among project staff</p>	<p>20,000</p>

<sup>13</sup> The Minimum Package of Services (MPS) for GBV survivors as reflected in the MGLSD GBV referral pathway. And the police protocol in the appendices.

	the Project efficiently and effectively during project implementation and minimize social impacts	social safeguard specialists to supervise and provide technical support for the implementation of the project and mitigation of impacts in the projects.					
<b>4</b>	<b>Monitoring and Evaluation</b>						
	Develop M&E program	Develop a comprehensive M&E plan to monitor SEP work plan and implementation	In Quarter 2 preceding implementation	-NUSAF IV PIUs Social and environment safeguards specialists GBV Specialist  OPM project staff and the DPGs	OPM	M&E Plan for SEP implementation in place  M&E Activities conducted	65,000
<b>5</b>	<b>Inform project affected communities about environment and social risks</b>						
b)	Support the decentralization of the land sector to ensure that communities and the vulnerable people have access to land services at lower costs.	Establish a trained, dedicated and committed network of community focal persons.	Maintained throughout Project implementation.	NUSAF IV project staff and the DPGs	OPM	- A number of focal points and persons identified and trained - A number of DPGs formed and trained - Institutional, legal and technical capacities strengthened.	
c)	Develop SEP for NUSAF IV	Develop a comprehensive SEP for implementation of the NUSAF IV project activities		OPM project staff	OPM	SE Implementation plan developed	80,000
<b>6</b>	<b>Communication and Information Disclosure</b>						
a)	Develop information dissemination strategy	Develop a strategy Identify the methods to	Maintained	OPM project staff and the DPGs	OPM in coordination WB	- SEP communication strategy in place	16,000

		disseminate the information Disclosure of information to stakeholders through multimedia outlets	throughout Project implementation.			- SEP plan in place - IEC materials developed - A number of disclosure channels made available	
b)	Develop relevant IEC materials for community engagements	Develop relevant IEC materials translated in local languages of the project location	Maintained throughout Project implementation.	OPM project staff and the DPGs	OPM in coordination with WB	- A number and categories of IEC material developed in relation to land and other relevant issues	IEC material development is Covered under development of the Communication strategy)
c)	Mobilize and reach out to all project beneficiary communities to create awareness on the Project and its benefits to the communities	Develop a sensitization plan in coordination and consultation with the district technical, political and local leadership Conduct sensitization targeting all project beneficiaries with a specific focus on marginalized and vulnerable persons of both genders	Quarter 1 of the Project implementation year  Maintained throughout Project implementation.	OPM project staff and the DPGs	OPM	- A number of community sensitization and sensitization awareness creation sessions held /conducted	20,000
d)	Conduct community sensitization	Develop a Community SE sensitization program, material and messages, GBV messages inclusive Conduct community sensitization	Quarter 1 Maintained throughout Project implementation.	OPM project staff	OPM	Number of community sensitization conducted	40,000
e)	Media engagements	Develop media engagement programs and messages	Quarter 1 Maintained throughout	OPM Project staff	OPM	Media engagements conducted	30,000
<b>5</b>	<b><i>NUSAF IV project sensitive channels for reporting in GRM</i></b>						

a)	Develop/Review GRM for specific NUSAF IV GRM procedures to accommodate the new NUSAF IV project	Undertake internal review of GRM for social and environment risks mitigation; Integrate GBV entry points within the GRM with clear procedures.	Quarter 1	OPM project staff	OPM safeguards Specialist	- GRM procedure integrated - GBV mainstreamed in the new GRM -GRCs established	65,000
c)	Review GRM reports/logs to comply with the NUSAF IV PID and also review for GBV sensitivity to ensure all vulnerable persons of both genders are not left out	Review logs for GRMs, reports documentation to ensure it follows standards for documenting grievances and GBV cases	During project implementation.	OPM project staff	OPM	Number of grievances registered Number of GBV cases documented	65,000

For more information about the implementation of the SEP, please contact the below persons (individual names may change):

Caro Lorika Brenda  
**Program Manager**  
carolorika@gmail.com

## 6.2 Management functions and responsibilities

At the national level, the proper implementation of the SEP will be under the direct responsibility of the NUSAF IV by the Project Director.

The TST will be assisted by the Program Manager. In addition, as needed due to the urgency of a situation, as for the current SEP, OPM has the capacity to mobilize and undertake the task. The OPM Communication team is composed of professional staff with complementary background communication skills. They will mainly support project information production and dissemination (preparation of webinars/video and GRM PR-materials).

The TST will oversee communication and engagement with key stakeholders. The project formulation team from OPM will oversee the document records, facilitation of logistical support to all consultation events, technical support (Google teams, WEBEX, Zoom) for conducting online public consultations, meetings with communities, and other interested parties, assisting consultant(s) access to field trips in the OPM Districts and any other duties related to SE.

## 6.3 Staff Engagement.

**National level:** At national level, the NUSAF IV TST will be comprised of a Social Safeguards Specialist and Gender Specialist, and these will be engaged on full time basis to among others spearhead and oversee SEP implementation throughout the project Implementation period.

**District level:** At the district level in all implementation districts, since project will be mainstreamed in government structures and systems, relevant subject matter specialists / technical officers including Communication Officers, Community Development Officers (CDOs) and others will be engaged on part time basis to among others spearhead and oversee SEP implementation throughout the project implementation period in their respective jurisdictions.

## 5 Grievance Redress Mechanism

### 7.1 Introduction

World Bank ESS10 as well as GoU Social, Safety and Health Safeguards Implementation Guidelines of October 2020 require that concerns and grievances of project-affected parties related to environmental and social performance, as well as general project implementation modalities should be received, addressed and responded to in a timely manner. Additionally, ESS7 emphasises that a grievance mechanism should be culturally appropriate and accessible to affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (VMGs) and considers the availability of judicial recourse and customary dispute settlement mechanisms among Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities. Accordingly, the project will establish a clear and transparent grievance redress mechanism that will receive, document, assess and resolve various categories of grievances / complaints within stipulated time frames. The mechanism will also have linkages and referral pathways to relevant existing mandated entities and offices in resolution of sensitive and unique cases.

#### 5.1.1 Objectives of GRM

The objective of the grievance mechanism is to

- i. Enhance project efficiency through clear and transparent means of receiving and resolving grievances / complaints that may result from direct and indirect consequences of the NUSAF IV Project activities in a timely manner.
- ii. Build trust between the project and the stakeholders including communities in general
- iii. Provide feedback to project affected persons on resolution of their grievances.
- iv. Use grievances as feedback for improving project implementation arrangements

The mandated stakeholders will leverage existing Local Grievance Redress Mechanisms, local leaders and other relevant existing structures at parish, sub-county, district and national levels. These will be assessed in terms of adequacy and further modified as well as strengthened as deemed appropriate.

#### 5.1.2 Scope of the GRM

The GRM will handle complaints arising from activities and implementation of the proposed NUSAF IV Project as well as any direct or indirect environmental and social impacts. Efforts will be made to ensure that the robust and equipped GRMs are in place by the time Implementing Agencies start preparation of ESIA and the grievance mechanisms shall continue to function until the completion of all construction activities and the defect liability period ends. Affected communities and other potential complainants should be fully informed of the GRM, its functions, procedures, timelines and contact persons through aggressive publicity campaigns including Print and electronic media, relevant local media, verbally, and through booklets and information brochures during consultations meetings and other SE activities.

The specific purposes of NUSAF IV-GRM will include the following:

1. Resolve project related grievances including environmental and social grievances in a timely, appropriate and cost-effective manner.
2. Build trust among project staff, communities and stakeholders in general.
3. Promote community empowerment and participation in project decisions that affect them.
4. Ensure proper documentation, prompt, fair and transparent resolution of grievances.

5. Provide feedback mechanism to project affected persons on resolution of their grievances.

The project GRM will include a mechanism to enable vulnerable or marginalized individuals or groups following the enactment of the AHA, 2023 to report incidents of exclusion or discrimination safely, ethically, and confidentially and to ensure such grievances are resolved in an efficient and effective way commensurate with the principle of non-discrimination and inclusion for all. This referral pathway will be developed with the support of the World Bank-provided Enhanced Implementation Support and Monitoring (EISM) outlined in the NUSAF IV ESMF.

### 5.1.3 Guiding Principles.

The design of NUSAF IV-GRM will be guided by the principles that among others make it Legitimate, Predictable, Accessible, Equitable, Transparent, Harmonised, Engagement and Dialogue, provide Continuous Learning, Process Simplicity, Objective, Fair, Independent, Confidential and Independent. These are expounded below”

- a) **Appropriateness and Proportionality:** It should be proportional to the level of environmental and social risk and the expected number and complexity of grievances or complaints about the project.
- b) **Legitimacy and independence:** The mechanism should be clear, transparent, with sufficiently independent governance structures to ensure that there is no bias or interference and that the process can be conducted fairly with respect to all parties.
- c) **Fairness and objectivity:** There should be no bias in discussing and resolving grievances
- d) **Simplicity and accessibility:** There should be an easy procedure for lodging grievances and the office for lodging grievances should be accessible.
- e) **Responsiveness, effectiveness and efficiency:** It should be quick to resolve grievances
- f) **Upholds the survivor centred approach (SCA):** GBV including SVAC survivors (complainants) should be supported to access the Minimum Package of Services (MPS)S delivered in accordance with principles of the SCA
- g) **Participation and inclusion:** Listen to the complainants, support the voiceless and marginalised to lodge grievances and consider their vulnerabilities in resolving such grievances
- h) **Non-Retaliatio:** Complainants should not face any sanction or other negative consequences for lodging grievances.
- i) **Partnerships:** There should be well established working arrangements with different entities which are important for managing different types of grievances including complex and sensitive ones such as SEA and SH.

### 5.1.4 Anticipated Grievances in NUSAF IV Project

Anticipated grievances for the NUSAF IV project will include those related to the following categories:

#### 1. Complaints in relation to general implementation

Poor Waste Management and contamination, wrongly recorded personal or community details, crop damage, Group conflicts, Land related, Exclusion, General Worker’s welfare related, Labour issues especially under LIPW, Delayed implementation, Procurement related and General damage to community resources and Assets.

## **2. Gender-Based Violence and Violence Against Children**

SEA, Abuse and neglect in family, Child labour, Psychological Aggression, Corporal punishment, Trafficking, Family wrangles, Economic exclusion, Infanticide, Rape (Gang rape, male rape-sodomy and marital, forced early marriage, Domestic Violence and Female genital mutilation.

## **3. Incidents**

Accidental death fatality, Loss of body part in an accident, Contamination and pollution, Damage to ecological resources, Accidental fire, Poisoning, Trafficking and forced labour and Natural Calamity (Earthquakes, mudslides, floods).

## **4. Fraud and Corruption**

Soliciting for bribes, charging informal fees, deliberate provision of wrong/incorrect info by beneficiaries, inclusion of ghost workers especially under LIPW and multiple enrolments.

The Implementing Agency (OPM) will establish and implement an effective GRM. Grievance Redress Committees (GRCs) will be established, trained and equipped as per appropriate structures with the view of helping them to ensure that the aggrieved or affected communities and third parties avoid resorting to the judicial system as much as possible. The project's GRM will include four successive tiers of extra-judicial grievance review and resolution. The first and second tiers are the Grievance Resolution Committees (GRCs) at parish and sub county levels. The third and the fourth tiers are the GRM Focal Persons at the district and the TST/PIU offices.

The GRMs have referral pathways to support escalations, complainants that may not be satisfied with one level and handling of unique/sensitive/specialised cases such as those of criminal nature, capital offenses. Referral ways will be relevant mandated public entities and offices such as Police, Labour Office, Probation and Social Welfare, Inspectorate of Government, Judicial Offices, etc., depending on the nature of the referred case. Judicial and administrative redress will as much as possible be avoided to avoid time wastage.

## **7.2 GRM Structure and Composition of the Grievance Resolution Committee (GRC) Process**

GRCs will be established at all levels (Parish, Sub- County, District and OPM levels) with an office. Based on experience with existing GRMs of various other projects, composition of these committees will be of a reasonable number of 5 - 6 members, with representation from relevant offices and structures at respective levels based on project design. Where there are already existing GRCs by other programmes, as much as possible, these will be utilised and further strengthened; and where they are non-existent, new ones will be established and strengthened. GRCs are expected to work on voluntary basis, but the project is expected to offer reasonable facilitation to ease assessment and resolution of grievances such as transport, stationery, communication, etc.

The Committee will be constituted through a participatory, transparent and democratic and gender sensitive election process where participants (stakeholders present or proposed beneficiaries) shall be nominated or seconded and shall be voted for to respective office positions. Since the project will deliberately target women, youths and other vulnerable groups, the Committee will emphasise having a



reasonable number of them elected as its executive and in the leadership positions. Figure 2 below provides a graphic representation of the referral pathway of the GRC process.

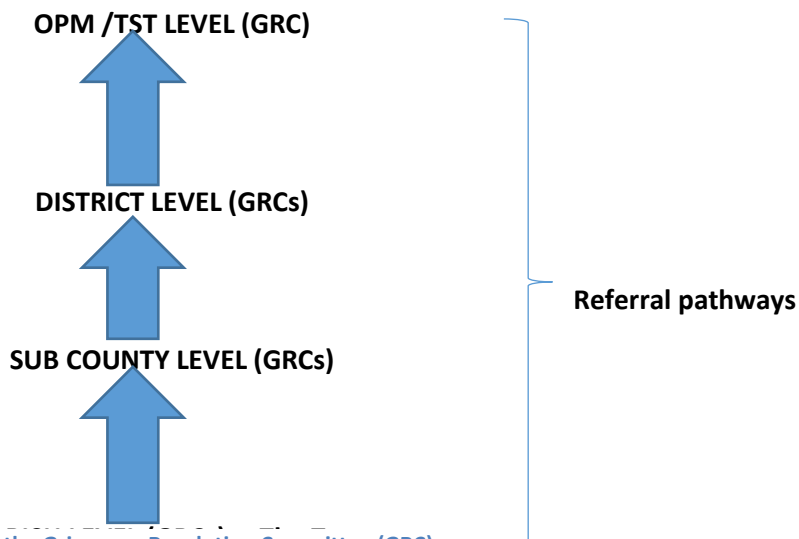


Figure 3: Structure and Composition of the Grievance Resolution Committee (GRC) Process

### Synergies and Complementarities

The NUSAF IV GRM will be harmonised and endeavour to maximise synergies and complementarities with relevant public structures and offices in districts and sub counties including Community Based Services Department (Community development, Gender office, Labour office and Probation), Local council courts, administrative offices and police among others. The effective implementation of the GRM will also entail leveraging relevant project documents including Communication strategy, Labour Management Plan and the GBV/VAC/SEA/SHA Action plan.

The resolution of grievances will be a two-stage process. Each of the two stages will involve the following steps:

**a) Stage One:**

- i. Receipt and recording or documentation of grievances,
- ii. Screening and assessment of grievances, and
- iii. The GRC Hearing Procedure.

**b) Stage Two:**

- i. Resolution of the grievance at the respective level.
- ii. Closure of grievance; and provision of feedback.
- iii. Record and documentation updating of the grievance.

The details of the above steps are below:

### 7.3 Receipt and recording or documentation of grievances

Any aggrieved individual, group or entity can lodge a grievance or complaint verbally, writing by filling a grievance form, use of phone (SMS or calling), email, etc. as deemed appropriate and convenient.

Anonymous grievances will also be accommodated. Grievances will be logged with the GRC and at all respective level and immediately recorded by the secretary in the GRM Logbook / Register book to be provided to all GRCs. An example of a grievance log is provided in this SEP. Details of grievances or complaints logged verbally will be captured as per the particulars of the grievance logbook.

The secretary of the respective GRC will review the received grievances, categorise and record them in a Grievance Register, then give an acknowledgement of receipt to the complainant for reference and follow up. To simplify the process of lodging a grievance, a variety of grievance log-in-channels will be used such as a dedicated phone number, web sites, e-mails, in-person, anonymous, suggestion box, among others.

During SE exercises or meetings organised in each project area, CDOs will explain to local communities the alternative ways of lodging a grievance. The GRM procedures will be disclosed through the Project's website and will also be advertised on billboards/posters in each community and at the entrance of the service provider's yard. Information material on GRM will also be made available at the information desks in districts covered by the project.

To ensure that all grievances are captured, the Implementing Agency will explain how the grievances received by district GRC members may be channelled through the Project's GRM. Training will be conducted for all GRC members on their roles and responsibilities and the implementing agency shall regularly monitor to ensure no grievances are missed.

#### **7.4 Screening and assessment of grievances**

All grievances will be registered, reported and tracked by Implementing Agency in the Grievance Register by a Grievance Focal Point who is responsible for receiving, logging, referring and following up on grievances. Once a grievance is logged, the related event(s) that caused the grievance will be tracked to prevent similar grievances or occurrences. The status number and trends of grievances will be discussed during weekly E&S meetings during the construction phase.

#### **7.5 The GRC Hearing Procedure**

A local GRC will be established at parish, sub-counties and district levels with an office. Once a grievance has been logged, the corresponding local GRC will be engaged to define a solution to the grievance. At this stage the grievance is reviewed in an informal (oral) way and the GRC members make and sign the minutes on the matter. If at Stage 1 the PAP's complaint is not resolved, the PAP is informed about grievance resolution procedures of Stage 2. The PAP has the right to use the procedures of Stage 2 without applying to Stage 1 procedures. Timeframe for resolving the stage 1 grievance is 30 days. Special provisions will be made for complaints of a confidential nature. Complaints on GBV and VAC as well as a pathway to safely, ethically, and confidentially receive cases related to exclusion or discrimination of vulnerable or marginalized individuals or groups following enactment of the AHA 2023 shall be received and referred immediately to service providers. The GRC shall convene whenever necessary (but at least once a month) and shall include the six members as defined in section 7.2 above.

Secretaries of the GRCs shall be responsible for creation, coordination, and documentation. Members of the GRC will be invited in accordance with the types of complaints to be addressed. The meeting will start without the complainants by reviewing all PAP or other person's complaints received since the last GRC meeting, and to propose a solution to all grievances within the past one month. Necessary assessments and reference will be made to support evidence based and amicable resolution. Relevant members of the public or purported witnesses may be co-opted as deemed necessary. Then, the GRC

will welcome the complainants whose grievances had been reviewed during the previous meeting to discuss proposed resolution.

For each grievance, the GRC will determine whether additional investigations are warranted. If so, additional information will be collected before the next GRC meeting and such information will be provided to the PAP before the meeting. The GRC will then inform the PAP about the date, time and place of its review meeting, and invite the affected persons accordingly.

The GRC will receive the complainant(s) and discuss with them the solution(s) to the grievance(s) that have been logged. The Committee shall draw up and sign the minutes of their discussion on the matter. If the grievance is satisfactorily resolved, the PAP will also sign the minutes in acknowledgement of the agreement. In cases where the project has agreed to put in place additional measures, the details will be specified, with a timetable for delivery, in the minutes of the meeting. If the grievance remains unresolved, the Stage 2 escalation process will be explained to the PAP. Stage 3 shall be handled by the implementing agencies' heads of department together with other relevant stakeholders.

### **7.6 Appeals, Escalations and Referrals**

If the complainant is either not satisfied or the case is beyond the jurisdiction of the respective GRC, the necessary appeals and referrals to the upper / next level GRC or relevant public mandated office will be allowed and supported appropriately. The respective GRC assists him/her in lodging an official grievance in accordance with the procedures of Stage 2 (where the plaintiff should be informed of his/her rights and obligations, rules and procedures of making a grievance, format of grievance, terms of grievance submission, etc.).

### **7.7 Closure of Grievances**

A grievance will be considered "resolved" or "closed" when a resolution satisfactory to both parties has been reached, and after corrective measures has been successfully implemented. When a proposed solution is agreed between the Project and the complainant, the time needed to implement it will depend on the nature of the solution. However, the actions to implement this solution will be undertaken within one month of the grievance being logged and will be tracked until completion. Once the solution is being implemented or has been implemented to the satisfaction of the complainant, a complaint closure form will be signed by both parties (Representative of the GRC and the complainant), stating that the complainant considers that his/her grievance is closed. The grievance will then be archived in the Project Grievance database.

In certain situations, however, the Project may "close" a grievance even if the complainant is not satisfied with the outcome.

### **7.8 Grievance Records and Documentation**

OPM, through the TST, will nominate a GRM Focal Point Person who will be responsible for management of a grievance database to keep a record of all grievances received. The database will contain the name of the individual (with consent of the affected Party) or organisation lodging a grievance; the date and nature of the grievance; any follow-up actions taken; the solutions and corrective actions implemented by the Service provider or other relevant party; the outcome; and how and when this decision was communicated to the complainant.

Periodic monitoring reports will provide information on grievance management. Periodic grievance monitoring and reporting will occur quarterly, bi-annually and annually. Desired analytics of the reports will be guided subsequently.

## MIS GRM MODULE STRUCTURE

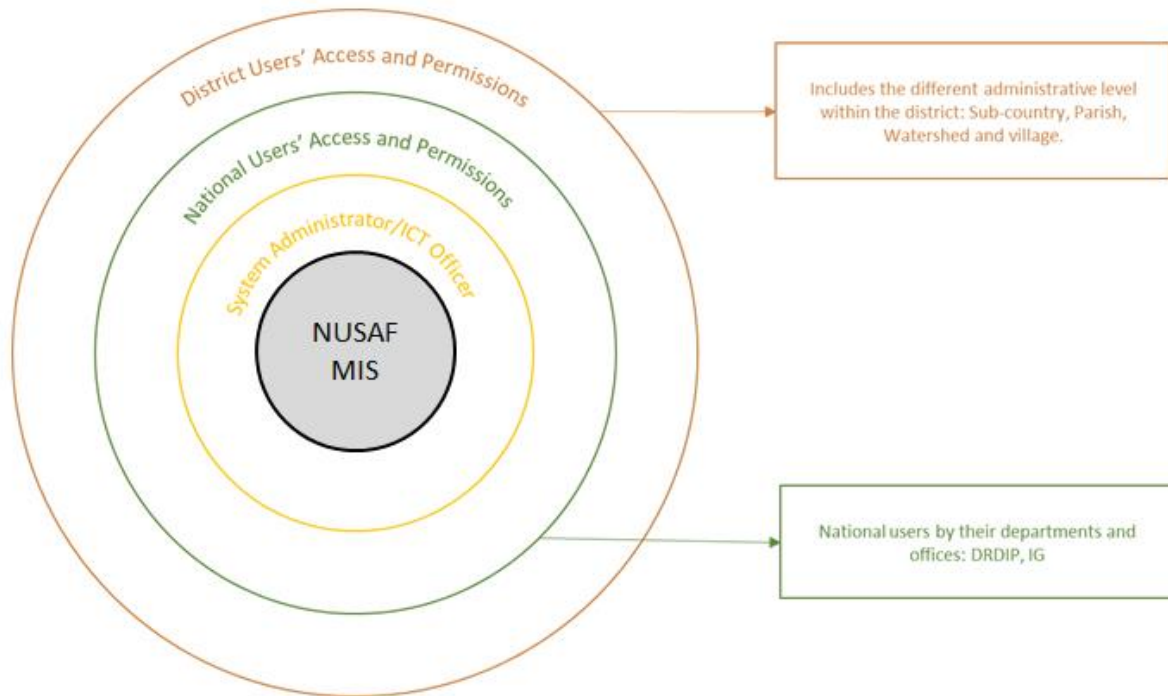


Figure 3: The process flow of the Grievance Redress Mechanism

### 7.9 GRM Handbook and Disclosure

OPM, as the Implementing Agency, will develop a handy but comprehensive GRM Book with sufficient details of the background, purpose, objectives, principles, structure, grievance redress process, legal and institutional frameworks, roles and responsibilities plus monitoring and evaluation framework on operationalization of the GRM. The GRM will be disclosed as early as possible and maintained throughout the Project lifecycle. It will be disclosed in a culturally appropriate manner in English and other local languages of the respective districts in an understandable format for all affected communities, stating the following information:

- Anyone can raise complaints, grievances, concerns, ask questions or make comments or suggestions related to the Project.
- Anyone can contact the GRM focal point using the GRM focal point's contact details provided.
- the GRM focal point is responsible for receiving complaints, grievances, concerns, questions, comments, suggestions, and for responding to the person on a non-anonymous basis or generally via the Project's website on an anonymous basis.
- the GRM focal point will confirm receipt of the complaint, grievance, concern, question, comment, suggestion, either providing a preliminary answer or confirming the expected timing to provide an answer.
- a tollfree hotline has been designed specifically for vulnerable or marginalised individuals or groups following the enactment of the AHA, 2023, that may be discriminated against or excluded from benefiting from the Project.

By using this grievance mechanism, the complaint, grievance, concern, question, comment, suggestion with respect to the Project development will be received by the Project proponent which will endeavour to answer the complaint, grievance, concern, question, comment, suggestion and engage with the complainant and the project's other relevant parties to mitigate any complaint, grievance, concerns, or incorporate any comment, suggestion in the Project development to the extent possible.

In addition, the World Bank-hired EISM firm will provide advice and recommendations to enhance existing project level grievance redress mechanisms to safely, ethically, and confidentially receive cases related to exclusion or discrimination of vulnerable or marginalized individuals or groups following enactment of the AHA 2023. In response to these recommendations, NUSAF IV TST will be responsible for strengthening the capacity of the existing project GRM as required to increase its awareness and ability to refer exclusion or discrimination cases under the Project to the EISM firm. The firm has established a nationwide GRM hotline – 0800 333125, hosted and operated by a local NGO, to receive grievances related to discrimination and exclusion under the Project. The guidelines for implementing mitigation measures to address AHA-Related risk including the use of GRM hotline are described in Annex 1.

**World Bank Grievance Redress Service.** Communities and individuals who believe that they are adversely affected by a WB-supported project may submit complaints to existing project-level grievance redress mechanism or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed to address NUSAF IV related concerns. Communities and individuals affected by NUSAF IV may submit their complaint to the WB's independent Inspection Panel, which determines whether harm occurred, or could occur, because of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the WB's attention, and WB Management has been given an opportunity to respond. Information on how to submit complaints to the WB's corporate GRS is provided in <http://www.worldbank.org/GRS>. Information on how to submit complaints to the WB Inspection Panel is provided in [www.inspectionpanel.org](http://www.inspectionpanel.org).

Further to the enhanced project-level GRM and the dedicated hotline, the World Bank has developed a specific window under its existing Grievance Redress Service (GRS) to manage complaints related to any World Bank supported project globally. A protocol has been developed to process all complaints related to exclusion or discrimination against vulnerable or marginalized individuals or groups following the enactment of the AHA 2023, in the Uganda portfolio.

The local government and all stakeholders will also be advised on the GRM so that they can communicate the step-by-step process to the Project affected people. The process flow of the Grievance Redress Mechanism is shown in Figure 3; while the process flow chart of workers' Grievance Redress mechanism is presented in Figure 4 below. A template of the GRM Recording Form can be found in Appendix 2 of this SEP.

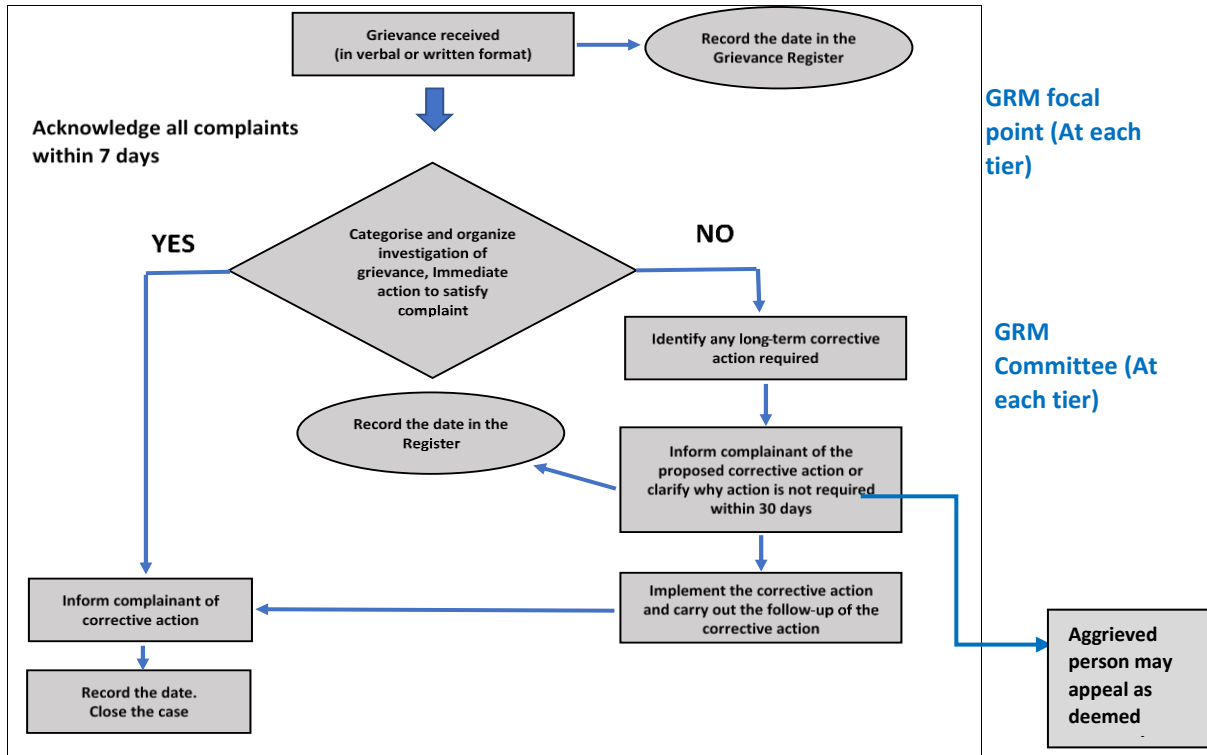
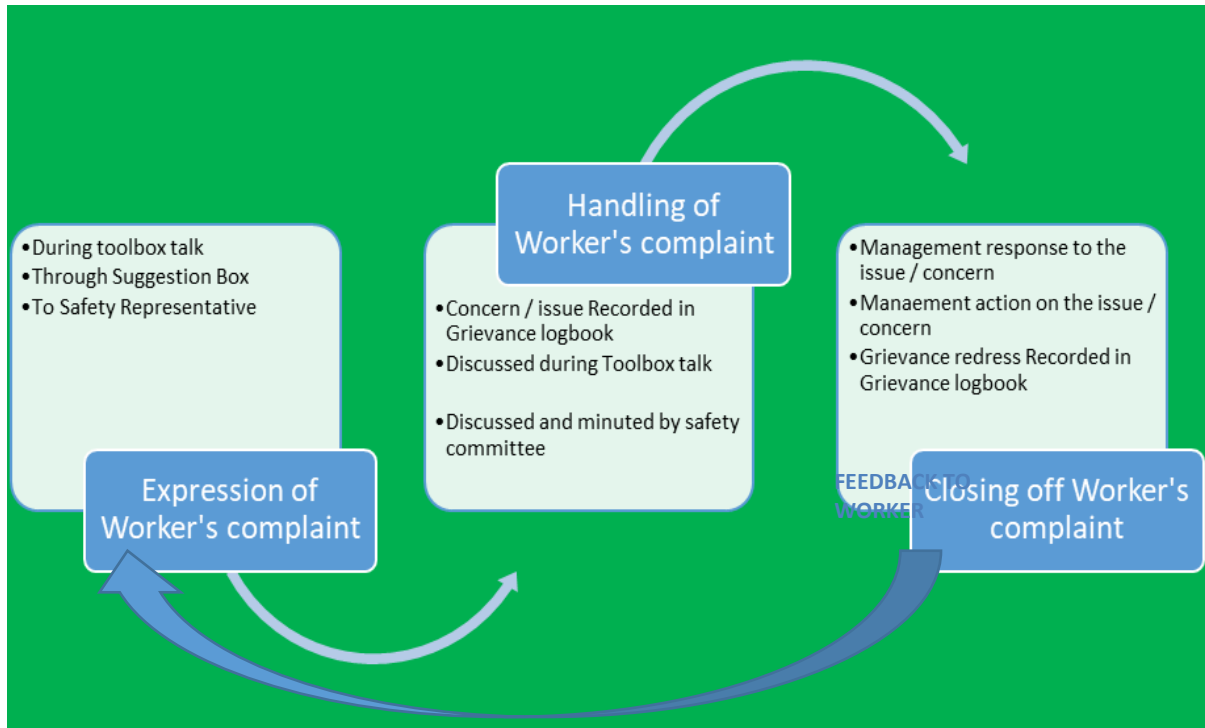


Figure 4: The Process Flow Chart of Worker's Grievance Redress Mechanism

### 7.10 Workers' Grievance Mechanism (Project Level)

The NUSAF IV Project Implementing Agencies will provide a grievance mechanism for workers to raise reasonable workplace concerns. Workers' grievances can be raised via email, suggestion box, anonymously, during toolbox meetings, or by contacting site emergency numbers or designated person, among others. The Implementing Agency will inform the workers of the grievance mechanism at the time of hiring and make it easily accessible to them. The mechanism will use an understandable and transparent process that provides feedback to those concerned without any retribution. The mechanism will not impede access to other judicial or administrative remedies that might be available under law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective bargaining powers. The later though should as much as possible be avoided and only be used as a last option because it is expensive and time consuming.



**Figure 4: The Process Flow Chart of Workers' Grievance Redress**

Once a worker's grievance has failed to be addressed at the first level or in case of dissatisfaction on part of complainant, it is then escalated to the next level or referred to an appropriate public office such as labour office. It should be noted that in compliance with existing national laws, some categories of grievances and crimes though to be still recorded in NUSAF IV Logbooks, depending on their nature, will be directly reported to the Justice Law and Order sector. This includes the police, the Directorate of Public Prosecution, and the courts of law, among others.

7.11 All workers and service providers shall be oriented and asked to sign the Codes of Conduct (CoC) and shall be bound by the clauses therein. Awareness raising and trainings shall be undertaken prior to the signing of the CoC and throughout the project life cycle. Such awareness creation will ensure that all the requirements in the CoC are clearly understood by all workers. This CoC shall prohibit workers from engaging in SEA, GBV, VAC and other criminal acts while employed under the project. In case of transgressions, appropriate sanctions will be applied if a worker is confirmed as a perpetrator and such as, a formal warning, reprimand, and/ or a suspension from duty, termination or referral to the police or other authorities as warranted.

## 7.12 Monitoring and Reporting

The monitoring, evaluation and reporting processes entail capturing of all key emerging issues raised by stakeholders that will further inform the SEP and/ or what needs to be addressed.

Monitoring the SE activities is important in that it ensures that consultation and disclosure efforts are effective; and that stakeholders have been meaningfully consulted early enough and throughout the process. Monitoring, evaluating and reporting of the SE activities constitute an important process, and the SEP anticipates this to be done at two levels highlighted as follows:

- On the short-term, monitoring of SE activities during the SEP preparation and implementation is aimed at ascertaining whether the anticipated SEP is being followed and expected outcomes are being realized. This level of monitoring also seeks to ascertain whether the necessary resources that have been deployed and are being used efficiently; whether routine reporting is being undertaken, and the preliminary report is being used to make improvements in the SEP and its implementation; and whether necessary support supervision for the SE team is being realized.
- And at the completion of all planned preliminary engagements and review of activities, outputs and outcomes to evaluate the efficiency and effectiveness of the SEP.

The SE will guide in identification of key performance indicators reflected in the objectives of the SEP and the specific engagement activities and make it possible to both monitor and evaluate the SE processes undertaken during both the preparation and implementation of the SEP and other monitoring frameworks.

The monitoring and evaluation will be the main mechanism to alert the NUSAF IV project management of any delays and problems encountered and these activities will help measure the extent to which the main objectives of this SEP have been achieved. To ensure that the implementation of SE is executed in line with this SEP, the activities will be monitored and evaluated internally by a Monitoring and Evaluation team at the TST at the national level and on ground at the district level. The TST will undertake the routine internal monitoring and evaluation of the implementation of the SE issues to ensure that all the responsible units follow the schedule and comply with the principles of the SEP. Several objectively verifiable indicators shall be used to monitor the impacts of the SE activities.

### 8.1 Involvement of stakeholders in monitoring activities

The OPM project's theory of change developed during the preparation stage is useful for monitoring and evaluation. It helps identify better Key Evaluation Questions, key indicators for monitoring, gaps in available data, priorities for additional data collection, and a structure for data analysis and reporting. With the clearly identified key indicators in the log frame of the project, the collection of the data for monitoring them will not require significant additional resources. Monitoring will be the responsibility of the paid project staff with the strong support of the OPM Secretariat Monitoring & Evaluation team.

In addition, MEL expert will develop M&E system within 90 days of the start of his duty. The stakeholders at various levels will be involved in monitoring the activities, considering their various interests' groupings. At national level, for example, biannual meetings will be used to present the progress report. Reporting of SE activities and outcomes to the WB will be done as part of the quarterly environment and social reports.

### 8.2 Reporting back to stakeholder groups

Stakeholders will be kept informed as the project progresses. The project will provide the opportunity to report back to the stakeholders on matters relating to:



- a) Progress on the NUSAF IV project in line with the Key Performance Indicators (KPI) to be monitored on a regular basis.
- b) Main findings from the periodic monitoring.
- c) Number of grievances disaggregated by gender received and resolved within a reporting period (e.g., monthly, quarterly, or annually) and number of those resolved within the prescribed timeline.
- d) Number of press materials published/broadcasted in the local, and national media.
- e) Any major changes to project-related activities and their schedule.
- f) Progress on implementation of the mitigation measures for social safeguard and the planned initiatives.

This information will be shared during:

- Periodic district level meetings with the women entrepreneurs and other stakeholders.
- Periodic meetings through the various established women platforms.
- Published reports on the OPM website or shared with key district stakeholder for further dissemination.

The results of SE activities will be reported back to both affected stakeholders and broader stakeholders as described below:

- At the biannual meetings with the PSC, discussions on the comments and recommendations will be presented as action items and shared on the last day of the event;
- For the comments on the consultant(s) report, TST will send the report to the main stakeholders via email. It will request them to provide their comments within one week. TST will then submit the revised report within 7 working days;
- Training, communication and knowledge materials will be sent electronically to the participants by the TST within 7 days after completion of the event.

These reports will rely on the same sources of communication that were used earlier in the current SEP document.

Stakeholders will be reminded of the availability of the grievance mechanism during meetings. In addition, the World Bank will provide support for enhanced monitoring of the risk of exclusion or discrimination for individuals or groups who may be vulnerable or marginalized, and to ensure that vulnerable or marginalized individuals or groups are appropriately consulted. Further details of this support are found in Annex 13 and 14 of the NUSAF IV ESMF.

### **8.3 Monitoring indicators for the SEP**

Several Key Performance Indicators (KPIs) will be monitored by the project on a regular basis. Indicators will include the following parameters among others:

- ✓ The number of public hearings, consultation meetings and other public discussions/forums conducted within a reporting period (e.g. monthly, quarterly, or annually);
- ✓ Number of project worker's engagements and sensitizations carried out monthly and quarterly and number of workers reached disaggregated by gender and occupation.

- ✓ The number of participants attending consultation meetings (disaggregated by gender) and other forums disaggregated to show women, youths and vulnerable and marginalized persons;
- ✓ The number of VMGs disaggregated by gender reached and consulted.
- ✓ The number of other vulnerable or marginalized individuals or groups disaggregated by gender reached and consulted;
- ✓ The number of free and fair consultations done without any coercion and intimidation.
- ✓ The frequency of public engagement activities.
- ✓ The number of public grievances disaggregated by gender received within a reporting period (e.g. monthly, quarterly, or annually) and number of those resolved within the prescribed timeline.
- ✓ Type of public grievances disaggregated by gender received

### 8.3 Monitoring and Evaluation Framework (Indicators) for effectiveness of the NUSAF IV SEP

Purpose	Period	Objectives	Indicators
Review Quantitative Indicators	Quarterly	Assess if stakeholders are correctly identified & categorized	Categories of stakeholders identified at national, regional, district and community levels.
		Assess if stakeholders are correctly analyzed	-Highlight of stakeholder potentials, levels of influence and interest
		To know engagement activities carried out	-Type and number of engagement activities per category -Type and number of engagement activities per level -Number of participants in activities
		Assess appropriateness of the engagement strategy / activity.	-Number of stakeholders understanding and executing their roles -Number of stakeholders who understand the project modality.
Review Effectiveness of the SEP	Annual	To assess compliance with the strategy	-Number of activities undertaken against plan -Number of grievances received by type -Number grievances resolved
		To evaluate progress with achieving results	-Number of stakeholders executing their roles and responsibilities. -Number of stakeholders demanding project support.
		Identify improvements and update the SEP	-Number of appeals received. -Number of comments and suggestions made -Qualitative assessment of the SEP

## 6 DISCLOSURE OF THE SEP

This SEP will be approved by the OPM and WB and disclosed on OPM website and through the World Bank's external website for the public access. Other environmental and social safeguard instruments under the NUSAF IV project will also be disclosed.

### **Appendix 1: Consultation Guide for Development of a Comprehensive SEP for the NUSAF IV**

1. Are you aware of the NUSAF IV Project? (Knowledge/awareness on the subject)
2. a) Yes..... b) No..... (Researchers give an overview)
3. What concerns, fears, expectations, and priorities do you have in relation to the proposed NUSAF IV project?
4. What anticipated potential risks and impacts do you foresee from implementation of the Project?
5. Do you foresee any gender risks or have any gender and vulnerability risks/concern/fears that might arise because of the Project? And why?) Yes..... b) No.....
6. What mitigation measures would you recommend averting these risks?
7. What available Grievance Redress Mechanisms (GRM) including Mitigation measures exist in the proposed project area(s)/districts?
8. What would be the best schedule (appropriate time and locations) for these engagements for the different stakeholders mentioned?
9. What would be the best method for communicating and the most appropriate language?
10. Which organizations i.e. CSOs, CBOs, government entities and other Development partners work with women, children and other VGMs or do work related to Economic empowerment of Women that the Project beneficiaries can take advantage of to learn from their success stories and good practices to benefit them so as to ensure continuity and sustainability after the project life cycle?
11. What kind of services do they offer?
12. Which other stakeholders do you think are relevant for these consultations at all levels?
13. What recommendations do you have that might benefit women and all the other VMGs and the community at large as well as programming in the next 4 year?

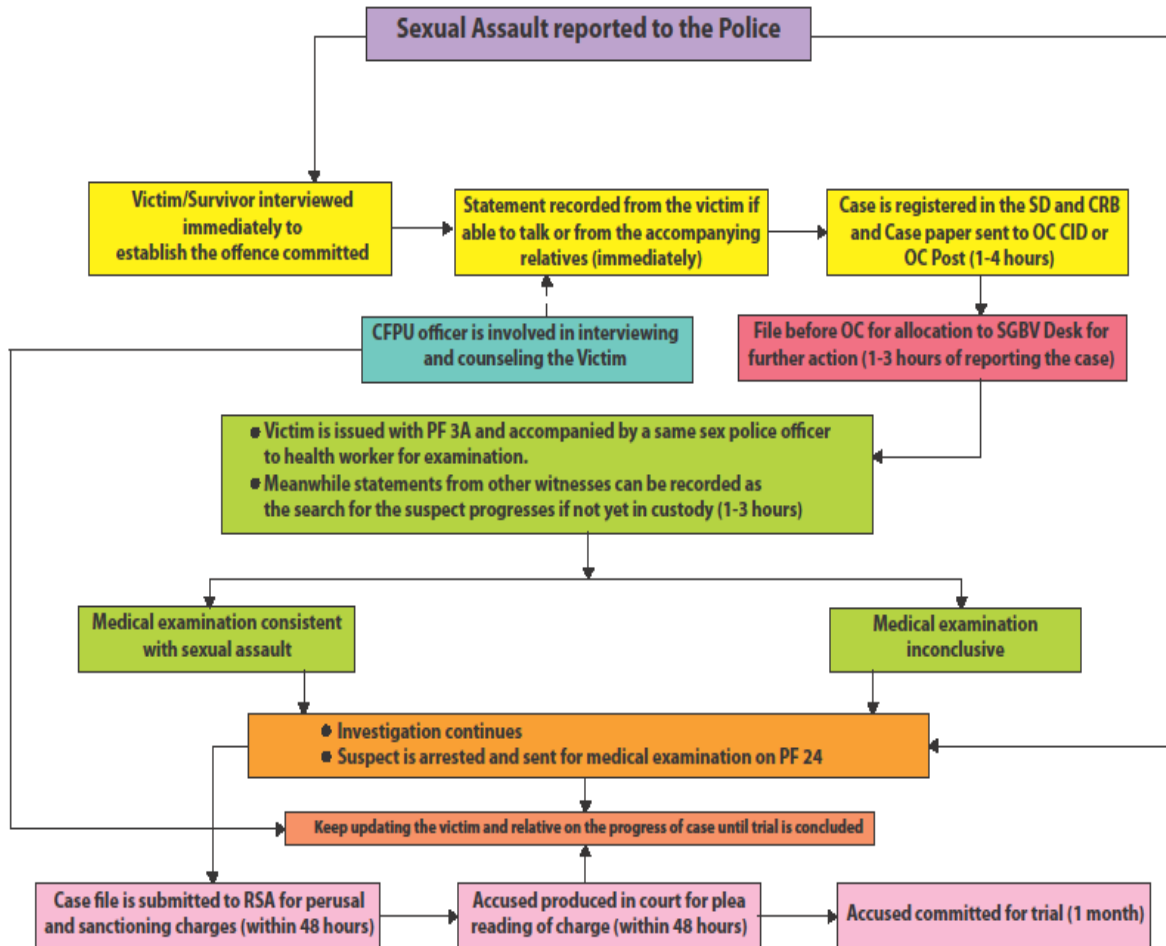
**Appendix 2: Grievance Form**

GRIEVANCE FORM	
Date:	
Reference Number:	
Full Name (optional and can be left blank for anonymous grievances):	
ID Number (optional and can be left blank for anonymous	
CONTACT INFORMATION: <i>(Please mark how you would like to be contacted: mail, telephone, email, in person)</i>	By Post: <i>Please provide mailing address</i>  By Telephone: By Email:
TYPE OF GRIEVANCE:	Individual: Group: Cultural:
DESCRIPTION OF INCIDENT OR GRIEVANCE:	<i>What happened? Where did it happen? Who did it happen to? What is the result of the problem?</i>
HAS THIS GRIEVANCE BEEN RAISED PREVIOUSLY BY YOU OR ANYONE ELSE?	No Yes Details:
DATE OF INCIDENT GRIEVANCE:	One-time incidence/grievance (date ...) Happened more than once (how many times ...) On-going (currently experiencing problem)
WHAT WOULD YOU LIKE TO SEE HAPPEN TO RESOLVE THE PROBLEM?	
Signature: Date: Please return this form to: Grievance Manager <i>[Add details of contact]</i>	
ASSESSMENT CATEGORY	
GRIEVANCE ACCEPTED Yes / No	
RESPONSE/ FOLLOW UP (SUMMARY OF RESPONSE AND CORRECTIVE ACTIONS TAKEN)	
RESPONSE TO APPLICATION Date: Person: Observations:	
CORRECTIVE ACTION AND SIGN-OFF Applicant satisfied with corrective action: Yes / No (Details)	

Is further action required: No / Yes (Details)  
 If Yes, date sign-off received from Application:


### Appendix 3: Management of SGBV Survivors and Referral Protocol by the Uganda Police Force

## Management of SGBV Survivors and Referral Protocol by the Police




**Appendix 4: Stakeholder Engagement Meeting Pictures**


Stakeholder Consultations in Bunyoro and West Nile regions

Photo	Narration
	<p>Consultations with sub county officials in Kakumiro DLG.</p>
	<p>Consultations with Adjumani Officials</p>


Stakeholder Consultations in Karamoja Region

Photo	Narration / Remarks
	<p>Consultations in Napak District</p>
<p>Photo</p>	<p>Narration / Remarks</p>

Stakeholder consultations in Elgon Region

PHOTOGRAPH	NARRATION
	<p>SAS Bukibino Sub-county in Bududa DLG addressing the NUSAF IV consultative meeting</p>

North Karamoja/ Teso Stakeholder Engagements

KAABONG DLG	
	<p>Timu Sub-County Consultations</p>

## Appendix 5: Detailed consultation Minutes Captured by Location

Critical Issues Raised during ESF-NUSAF IV successor consultations by Technical, Political and Opinion leaders in Karamoja Region.

No	Sector	Issues raises
1	Security Sector	<p>Security issues in Karamoja need to be holistically and sustainably managed as this will affect NUSAF IV implementation by communities. Cordon and search carried out now at disarmament exercise at wee hours has continued to scare many community able bodied members and a majority no-longer stay in their homes.</p> <p><i>The Project Director/OPM to work out with Ministry of defence and Ministry of Security on best solutions. This will support in addressing <b>ESS4 requirements</b> community health and safety (security of the beneficiaries)</i></p> <p>Human animal conflicts in the IK lands in Kaabong, Karenga, Nakapiripirit, Nabilatuk, Napak and Moroto requires special attention and discussions initiated between NUSAF IV, Karamoja Ministry, Defence and UWA. And clear management and compensation measures agreed upon address issues related to community lives and livelihood destruction.</p>
2	Education Sector	<p>The project to have special consideration to promote food production in schools to support feeding and contribute to education out comes (retention, girl child participation, enrolments, nutrition, performance, etc.)</p> <p>The project Director to work out with ministry education to provide infrastructures especially dormitories, fences and vocational hubs to support children stay in schools as many are exposed and have turned out to rustling as a way of livelihoods</p>
3	Health Sector	<p>Health structures to be considered in the NUSAF successor specifically to address issues of health and safety under safeguards and support GBV and VAC referrals and support the VHTs programs.</p> <p>Health sector to support the nutrition component implementation to cover pregnant, lactating, children under two, critically sick (HIV and other illnesses), the elderly and Persons with severe disabilities</p> <p>Health systems strengthening to be part of the nutrition component either supported by government or development partners in partnership with NUSAF IV.</p> <p><b>(ESS4 community Health and safety)</b></p>
4	Water and Hygiene Sector	<p>The Project to promote water for production (Irrigation and livestock use) in all districts</p> <p>Support needed to safe water for drinking and domestic use</p> <p>Support needed through LIPW on desilting existing valley tanks and water ponds</p> <p>Promote rainwater harvesting technologies at household levels</p> <p>5Support for establishment and training of Water user committees on O&amp;M of facilities</p>



		<p>Support to waste management specifically in the urban and growth centres</p> <p><b>(ESS 3 Resource efficiency and pollution management)</b></p>
5	Production Sector	<p>Production on and off farm activities be informed by agricultural zoning of wet and dry areas. This will enable communities to maximize production and results in the end Settlement Development Initiatives to be promoted at sub county level (Each per sub country) for integrated and large-scale projects</p> <p>Need to promote / establish Animal health clinics to-support animal health challenges faced by livestock farmers and extension staff attached as well as community animal health workers identified and trained to manage. This can be for business</p> <p>Under savings, the commercial officers provided with clear modules to support savings component and also a reporting module developed through MIS to track household's savings from livelihood and public works participants</p> <p>Marketing component strengthened to enable farmers have one stop center where all products can be accessed by traders but also through digital means particularly for livestock farmers</p> <p>Promotion of high value crops and cash crops in all NUSAF IV targeted sites and guided by potential value chains available for each district</p> <p>Pest management procedures and technologies need to be developed to manage army worms and locusts that tend to destroy crops at early stage subsequently affect yields and lead to food insecurity <b>(ESS 3 Resource efficiency and pollution management)</b></p> <p>Storage facilities should be prioritized for the project for easy bulking of farmers products</p> <p>Need for the project to consider Investments in pastures and hey management for farmers doing dairy and bull fattening. And apiary for export as there is very high potential in Amudat, Nabilatuk, Napak, Moroto and kaabong under the IK</p>
6	Roads Sector	<p>NUSAF IV to support access roads and bridges to enhance accessibility for farmers and service providers in the project area. Many community access roads and bridges are very much in bad state. E.g. Lokeruit SBDI can't be accessible during wet season due to the river crossing in the area which requires abridge. Similarly, to all site which SBDI model will be implemented.</p>
7	Natural Resources Sector	<p>The project to promote agroforestry technologies that brings in both climate change and address disaster and food security challenges</p> <p>The project to promote regeneration and assisted regeneration of degraded ecosystems through area closures for indigenous species in degraded fragile ecosystems such as river banks, wetlands, reserves etc. This will support</p>

		<p>maintenance of indigenous species</p> <p>Promote the growing of indigenous species than exotic species through establishment of sustainable green houses in every sub county</p> <p>Tree plantation done with landlords to guarantee O&amp; M and sustainability. And clarity of benefit sharing between landlords and communities defined</p> <p>Massive tree planting program as core responsibility must be embedded in NUSAF IV program so each benefiting household as a requirement plant up-to 5 assorted trees (fruits and shed) and nurtured for at least 6 months before they access funding. An assessment shall then follow for successful households to be included in the project</p> <p>LIPW and DRF components to continue under NUSAF IV. However, they must be targeted on critical assets such as desilting of valley tanks, community access roads, sites of up-to 100 acres tree plantations, sand dams, fruit plantations, and as well as used to support works on the SBDI sites</p> <p>Sustainable energy technologies to be thought through and promoted in Karamoja to address issues of charcoal burning and high fuel wood consumption.</p> <p><b>Address (ESS 3 Resource efficiency and pollution management)</b></p>
8	Finance and Administration Sector and general project operations	<p>The scope of implementation structures needs to be enhanced to accommodate all critical sectors for NUSAF IV.</p> <p>There is need for clarity on roles and responsibilities for each implementing entity including political stakeholders</p> <p>The CAO to appoint a coordinator from administration who will work with technical focal points attached to components</p> <p>CFs recruitment be the responsibility of the sub county and requirements/qualifications should be in-line with components</p> <p>The CAO and CFO both sign on the fund authorization document for controls</p> <p>Auditors to advise the CAO and CFO on beneficiaries' access to funds from banks after physical audit report is produced every month.</p> <p>Operations funds to be disbursed according to quarterly agreed upon activities with clear codes for each entity</p> <p>Timely disbursement of sub projects funds latest by second quarter of every FY to facilitate proper planning, implementation and accountability of project funds. The experience under NUSAF3 saw lots of funds swept back which subsequently affected implementation and accountability of funds.</p> <p>Digital payment models should be studied including SAGE models to inform the NUSAF IV beneficiary cash payments</p> <p>Social registries must be updated and used as data base for</p>

		<p>targeting to minimize targeting errors of exclusion.</p> <p>Urban and growth centers to have separate menu from the rural areas and should include Waste management facilities, value addition, packaging and processing facilities, access roads, market infrastructure, urban agriculture and physical planning with tree planting of ornamental trees on road reserves.</p>
9	Community Based Sector	<p>Skilling the youth and women through vocational training centers and mentorship for 1) Soft skills of life (behaviours, goals, vision) (decision making, personal development to develop personal goals both soft and long-term individual goals) and 2) work reediness skill to prepare the to the world of work and specifically on income, vision e.g. carpentry, crafts, welding, events management, ware/storage management, etc. (Financial literacy ability to budget and save, VSCL, meet plans in the soft skills)</p> <p>Enhance the CDOs mobilization role and mind set change activities to support smooth uptake and sustainability of NUSAF IV interventions. This should be in-line with the PDM pillars</p> <p>Enhanced targeting processes managed by the CDOs</p>
10	Planning Units, ICT and communications	<p>The planning unit to provide and as well verify data provided for planning in-line with UBOs data and National planning statistics</p> <p>Planning unit to oversee monitoring and Evaluation activities. For knowledge management, learning, visibility and replication of innovations and good practices</p> <p>Intensify communication for development and with a focus on beneficiaries who are direct project stakeholders (use of social media, radios, TV shows) where these categories go speak on behalf of the project</p> <p>Create a technical working group for this team to manage and dissemination of results systematically and accurately in various products to the project stakeholders</p>
11	Safeguards compliance Sector	<p>ESMP funds clearly provided for, and contingency budget embedded to cater for un-anticipated crisis. Each of the component (health safety, Environmental and social risks management) have clear budgeted codes</p> <p>ESMPs developed with clear and measurable targets. This should also be uploaded into the MIS</p> <p>DEOs and CDOs to implement Capacity building activities under safeguards and support communities to implement the onsite activities</p> <p>Local Environment Committees and Grievance Redress Committees established in all parishes to support in monitoring the implementation of Safeguards on site and off sites activities done at community levels in-line with the National Environment Act 2019 and manage complaints and grievances at community levels</p> <p>NEMA role in monitoring of environmental and safeguards activities need to be strengthened</p>

		<p>Complaints and grievance management a responsibility of the Community development officer. This same team to support IG on STAAC component. <b>(ESS 10 requirements)</b></p> <p>VMGs plan needs to be developed and monitored on as was in NUSAF3 and disclosed. <b>Address ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional</b></p> <p>GBV and VAC action plans be developed and financed and implementation assigned to the gender and probation officers</p> <p>PWD and Disability inclusion shouldn't be given special consideration in the project, targets set, and progress tracked, and reports shared with ministry of gender</p> <p>Physical cultural resources need to be gazetted improved and protected for ecotourism and promotion of Karamoja cultural heritage <b>(ESS8 requirements on cultural heritage)</b></p> <p>VHTs to work with the safeguards and health to support health and safety requirements including management of incidents /accidents and reporting on this on monthly basis ( <b>ESS2 on labour and working condition &amp;ESS4 community Health and safety)</b></p> <p><b>UWA and NFA to have discussions and sign MOUs with communities utilizing NFA and UWA lands.</b></p>
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Critical Issues raised during NUSAF successor consultations by Technical, Political and Opinion leaders in Elgon Sub-region

No	Sector	Issues Raised
1	Security Sector	Human-animal conflicts in the sub-region especially in Bududa districts where the people who enter the National Park are sometimes mistreated and/or killed by the park authorities. This requires special attention and discussions initiated between NUSAF IV, district local governments, Ministry of Defense and UWA. Management options that allow people to access the park resources through a collaborative mgt should be promoted <b>(ESS4 requirements community health and safety (security of the beneficiaries)</b>
2	Education Sector	The project should prioritize construction of Schools to reduce the levels of illiteracy in Amudat. In all districts visited (Amudat Bukwo, Bududa, Manafwa and Mbale) the structures are dilapidated, while some areas do not have schools Amudat district particularly called for construction of boarding schools given the insecurity in the district. The construction of schools for both primary and secondary with a component of dormitories and staff houses can be extended to all districts in Elgon sub region. Districts, therefore, recommend that part of the funds be used to construct schools, dormitories as well as teachers' houses.
3	Health Sector	Districts highlighted the need to improve health facilities in the Elgon region. Lack of structures, facilities like drugs as well as staff houses are a common problem in the region. This will improve health standards and reduce on the vulnerability of the communities.

		<i>Establishment of rehabilitation centres for GBV/VAC victims to offer counselling services especially in Bukwo &amp; Manafwa districts (ESS4 requirements community health and safety (security of the beneficiaries)</i>
4	Water Sector	<p>The Project to promote water for production (Irrigation and livestock use) in all districts, as a mitigation measure to drought and crop failure</p> <p><i>Support needed to safe water for drinking and domestic use</i></p> <p><i>Promote rainwater harvesting technologies at household levels.</i></p> <p><i>Construction of proper water drainage channels to reduce on water logging common in many parts of the sub region (ESS4 requirements community health and safety)</i></p>
5	Production and Marketing Sector	<p>Marketing component strengthened through marking specific production zones for specific products and linking buyers to those zones</p> <p><i>Promote Value Addition in all produce to improve prices and increase farmers' incomes</i></p> <p><i>Promotion of high value crops and cash crops in all NUSAF IV targeted sites and guided by potential value chains available for each district</i></p> <p>Pest management procedures and technologies need to be developed to manage army worms, locusts and banana wilt among others that tend to destroy crops at early stage subsequently affect yields and lead to food insecurity (<b>ESS 3 Resource efficiency and pollution management</b>)</p> <p>Storage facilities should be prioritized for the project for easy bulking of farmers' products</p> <p>And apiary for export as there is very high potential in Amudat, Bukwo and Bududa.</p> <p>Power extension and connections in the sub region will aid the value addition (agro-industrialisation). Currently it is very low especially in the lower local governments and therefore OPM to engage MEMD to expedite the process (<b>ESS 3 Resource efficiency and pollution management</b>)</p>
6	Roads Sector	The project should support construction and rehabilitation of access roads and bridges to enhance accessibility to markets for farmers' products and help farmers' access service providers in the project area. Many community access roads and bridges are very much in bad state and impassable especially during the rainy seasons ( <b>ESS4 requirements community health and safety-</b> (avoidance of accidents))
7	Natural Resources Sector	<p>The project to promote regeneration and assisted regeneration of degraded ecosystems through area closures for indigenous species in degraded fragile ecosystems such as riverbanks, wetlands, reserves etc. This will support maintenance of indigenous species</p> <p>Promote the growing of indigenous species other than exotic species.</p>

		<p>The project should consider integration of alternative efficient energy sources since over 90% of the people depend on firewood.</p> <p>The project should promote conservation of the environment especially in hilly areas of Elgon which are prone to land/mudslides</p> <p>Appropriate soil and water conservation structures to reduce the effects of soil erosion.</p> <p>Promote alternative income generating services that are eco-friendly to reduce on encroachment &amp; reliance on natural resources. <b>(ESS1 requirements on Assessment and management of risks and impacts)</b></p>
8	Finance and Administration Sector and general project operations	<p>Provision of adequate funds to districts to support project implementation</p> <p>Involvement of all department (administration audit, communication, etc) in the implementation of project activities</p> <p>Time release of funds to support project activities</p> <p>Support districts with vehicles and motorcycles to support project implementation</p> <p>Support lower local government units with funds to carry out technical backstopping and routine monitoring</p> <p>Digital payment models should be studied including SAGE models to inform the NUSAF IV beneficiary cash payments.</p> <p>Promote transparency and accountability for all project stakeholders including beneficiaries.</p> <p>Establish the reward and sanctions for beneficiaries' performance check.</p>
9	Community Based Sector	<p>Programs for skilling the youth and women should promote an all-inclusive targeting criterion to ensure no one is left out</p> <p>VMGs should be assisted to acquire all registration requirements. The project should work with NIRA to ensure people register and get IDs in time.</p> <p>Special attention be given to the child-headed households &amp; the elderly also to people with illnesses such as HIV/AIDs and T.B. among others.</p> <p>Enhance the CDOs mobilization role and mind set change activities to support smooth uptake and sustainability of NUSAF IV interventions. This should be in-line with the PDM pillars</p> <p>Enhanced targeting and registration of beneficiary processes managed by the CDOs working closely with the LC I leadership.</p>
10	Planning Units, ICT and communications	<p>The planning unit to provide and as well verify data provided for planning in-line with UBOs data and National planning statistics</p> <p>Planning unit to oversee monitoring and Evaluation activities. For knowledge management, learning, visibility and replication of innovations and good practices</p>

		<p>Intensify communication for development and with a focus on beneficiaries who are direct project stakeholders (use of social media, radios, TV shows) where these categories go speak on behalf of the project</p> <p>Create a technical working group for this team for management and dissemination of results systematically and accurately in various products to the project stakeholders</p>
11	Safeguards compliance Sector	<p>ESMP funds clearly provided for, and contingency budget embedded to cater for un-anticipated crisis. Each of the component (health safety, Environmental and social risks management) have clear budget codes</p> <p>ESMPs developed with clear and measurable targets. This should also be uploaded into the MIS</p> <p>DEOs and CDOs to implement Capacity building activities under safeguards and support communities to implement the onsite activities</p> <p>Local Environment Committees and Grievance Redress Committees established in all parishes to support in monitoring the implementation of Safeguards on site and off sites activities done at community levels in-line with the National Environment Act 2019 and manage complaints and grievances at community levels</p> <p>NEMA &amp; MWE role in monitoring of environmental and safeguards activities need to be strengthened.</p> <p>Complaints and grievance management a responsibility of the Community Development Officer. This same team to support IG on STAAC component. <b>(ESS 10 requirements)</b></p> <p>VMGs Plan need to be developed and monitored on as was in NUSAF3 and disclosed. <b>Address ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional</b></p> <p>GBV and VAC action plans be developed and financed and implementation assigned to the Gender and Probation Officers</p> <p>PWD and Disability inclusion should be given special consideration in the project, targets set, and progress tracked, and reports shared with MoGLSD.</p> <p>Physical cultural resources need to be gazetted improved, protected and developed for ecotourism and promotion of Karamoja cultural heritage as well as the Bamasaba cultural heritage <b>(ESS8 requirements on cultural heritage)</b></p> <p>VHTs to work with the safeguards and health to support health and safety requirements including management of incidents /accidents and reporting on this on monthly basis <b>(ESS2 on labour and working condition &amp;ESS4 community Health and safety)</b></p> <p><b>UWA and NFA to have discussions and sign MOUs with communities utilizing NFA and UWA lands.</b></p>

Critical Issues Raised during NUSAF IV Consultations by Technical, Political and Opinion Leaders in Bunyoro Sub-Region

No	Sector	Issues raises
1	Security	Security organs need to be involved in the districts to mitigate vandalism of infrastructures.
2	Education	The project to consider providing direct benefits in education other than parents earning and taking their children to school. This could include construction of better schools and where structures exist then they can be renovated for a better learning environment. It was mentioned by one of the RDCs that many children tend to drop out of school in P3 and P4. This is because they would lack motivation while at school since they would sit on dusty floor at home and experience the same at school.
3	Health	<p>All external workers to work on the projects within the communities should screen for diseases and ensure they are safe <b>(ESS 1)</b>.</p> <p>The community as well as the workers should be sensitized on health risks and issues to avoid infection and cross infection as well as unwanted pregnancies <b>(ESS 1 &amp;3)</b>.</p> <p>To avoid sexual infections, condoms should be available at all working sites and increase sensitization among the people at those working sites <b>(ESS 1&amp;3)</b>.</p> <p>Consideration to increase budget for health services as well as infrastructure in hard-to-reach places since the communities host refugees even though they may not be documented and are not in camps. The high number of refugees has increased pressure on services offered to the population, health inclusive.</p>
4	Water and Hygiene	Improve access to safe water in the communities.
5	Production	<p>With expectation of increased production, the project should include a valuation program and improve the value chain of whatever shall be produced by the communities. This will ensure more job creation in the community and therefore gain more financially rather than sell the produce directly to middlemen/brokers who tend to gain more than the producers.</p> <p>Introduction of irrigation to boost production</p> <p>Crops farmed in the subregion include Maise, beans, cassava, rice, bananas, coffee, cocoa other items in agriculture include dairy farming, dual purpose cattle/livestock, goat rearing, piggery, poultry, fish farming.</p>
6	Natural Resources	<p>Provided tree seedlings for planting to boost the environment protection <b>(ESS 6)</b></p> <p>Undertake impact assessment before and after the project to account on biodiversity and avoid/mitigate on loss <b>(ESS 6)</b></p> <p>Most of the land is under customary ownership. There are also squatters on Milo land of absentee landlords and a</p>



		<p>good number of the landlords do not even know they have the land in the sub-region. A few people have freehold and part of whom got the land through the president's initiative <b>(ESS 5)</b></p> <p>Majority of the institutions including government institutions are on the Kingdom land and the leaders recommended that the government should compensate the Kingdom so that the institution could fully own the land they are on <b>(ESS 5)</b></p>
7	Finance, Administration, general project operations and design	<p>The project should facilitate the district leadership especially the focal persons adequately to avoid gaps that would be considered as corruption caused by IG who are in most cases well facilitated in their work.</p> <p>Inclusion of local government leadership in the project design to minimize challenges as experienced in the predecessor projects. Much of the challenges as expressed were around beneficiary targeting and identification of appropriate enterprises for the beneficiaries.</p> <p>The project funds sent to the district should have clear expenditure lines to avoid misallocation or misappropriation.</p> <p>Measures should be put in place to recover any lost or misappropriated funds.</p> <p>Political, religious, cultural leaders, modal farmers/entrepreneurs, head teachers and existing implementing partners need to be involved in the project from design and throughout implementation <b>(ESS 10)</b>.</p>
8	Community Based, social and beneficiary targeting	<p>The project should target vulnerable groups like the elderly, youths, women and PWDs. However, participants were of the view that the poor should not be targeted to take on enterprises that would take a lot of their resources and technical resources, otherwise it would lead to failure of the projects. Some of the enterprises that would not fit the poor are like livestock rearing.</p> <p>Project to consider mindset change training to all beneficiaries as an introduction/initiation to participate in project activities. Many of the community members were said to have poor mindset and would not be transformed if they are funded in the current state.</p> <p>In addition to mindset change, all targeted beneficiaries should also receive financial literacy to enable them to handle and plan better whatever they shall earn. This will also help reduce conflict among group members and most especially in homes.</p> <p>Local content should be enhanced in its actual meaning. It had been observed in other projects that local content provision was available on paper but was never implemented as described on paper. Key supplies were</p>

		<p>centralized, part of which crippled many of the projects for sample supply of farm inputs like seeds, cuttings and livestock. This will also ensure that the revenue is retained at the community level and not taken out through external service providers.</p> <p>Projects should not break social fibre and networks in the community or take away their responsibility. It should also promote ownership. Example, NAADS gave 5000/= facilitation for meetings and with that, people never attended meetings thereafter.</p> <p>Potential GBV, VAC, child labor, sexual abuse and exploitation once the projects start <b>(ESS 1,2&amp;3)</b></p> <p>Conduct a baseline survey in the community to ensure the right persons are targeted to avoid elite capture in the project.</p> <p>Most land is owned by men and women may be marginalized on projects that regard land use and ownership.</p> <p>In Kakumiro, the leaders expressed concern for more immigrants in the community, the majority of whom are not documented <b>(ESS 2)</b>.</p> <p>Members of Faith of Unity do worship on the 2, 12 and 22 of every month and on those days they do not work. This may limit their participation in the projects.</p> <p>The Faithfuls of Nyangakaibo do not believe in money economy, immunization, registration of persons and are poorest in health seeking behaviours and these may limit their participation. <b>(ESS 8 &amp; 10)</b></p> <p>Timing for community meetings should be considerate of the seasons.</p> <p>The project to consider targeting families.</p> <p>The leaders requested that the poor should never be targeted to participate in enterprises with long gestation periods since they are incapable of maintaining or managing such projects e.g., livestock rearing as most of them had experienced failure in the past. Such projects should be entrusted to persons with capability so that the poor can benefit indirectly.</p> <p>There is a group of marginalized people in Budongo forest (the pygmies) along Masindi Bulisa Road who also need to be considered as a target group to benefit in the project <b>(ESS 8)</b></p> <p>The livelihood activities that the communities think would be consider inappropriate for VGs are prostitution and child labour.</p>
8	Planning Units, ICT and communications	<p>Communication within the subregion should utilize the local languages i.e., Runyoro, Runyankore, Rukiga and Lutoro. Runyakitara alone does not serve the population well. Other languages to be considered include Alur, Bagegere, Luo, and specifically for the refugees, Swahili and French. <b>(ESS 10)</b></p> <p>Methods of reaching out to the community would be</p>

		<p>through phones, meetings/barazas, religious institutions, radio (Mambiam KCR and Amazon) and WhatsApp groups for the technocrats especially at the district level <b>(ESS 10)</b></p> <p>Request to engage ICT officers at the direct level for better implementation especially with the use of MIS. In the previous projects, ICT officers would only have last minute considerations to support challenges rather than work with the administration and management to avoid or eliminate the challenges.</p>
9	Physical cultural resources	<p>The sensitive PCRs mentioned to be considered while implementing the project include;</p> <p>Semwema cave (1 Km long) in Kakumiro town council. It used to be a barracks for the Kabalega.</p> <p>Birembo war memorial site in Birembo subcounty.</p> <p>Agasani, burial grounds for the Kings in Nalweyo Subcounty</p> <p>Kooki Haibare (Birthplace of Andrea Kahwa (Uganda martyr)</p> <p>Palaces in Hoima and Masindi.</p> <p>Musagya &amp; Mukazi mukulu</p> <p>War battle ground and the caves</p> <p>Monument: Buhimba war monument. Burial grounds for war heroes</p> <p>Muhangaizima, a cultural herbal collection centre in Bugoma forest.</p> <p>Mparo: Burial ground for Kings/Royal tombs.</p> <p>Kibiro hot springs. Has salt which is medicinal. Use of the water for healing through bathing (Bathing for disease cure).</p> <p>Karuzika; Rotyal palace</p> <p>Katasiha caves: Hoima city</p> <p>Freedom tree in Mparo <b>(ESS 8)</b></p>
10	Safeguards compliance	<p>Labor officers to be involved in the projects and should routinely visit sites to listen to the plight of the workers and ensure legal and regulatory requirements are followed and implemented <b>(ESS 2)</b></p> <p>The districts have GRC structures in place though they need to be supported <b>(GOU Regulations &amp; ESS 10).</b></p>

Critical Issues Raised during NUSAF IV Consultations by Technical, Political and Opinion Leaders in West Nile Sub-Region

No	Sector	Issues raises
1	Security	Zombo has inadequate security because they only have one central police station which puts many people at risks. The district requires more police posts, and the project should consider supporting to put in place the police stations.
2	Education	Need to construct new schools and teachers houses, Rehabilitation of current schools alone is not enough. Many of the children do not finish their education especially primary level, at about P4, they dropout. With little and poor exposure, they are not able to sustain initiatives taken in such social action programs.
3	Health	A lot of pressure on health facilities due to increase population in the district resulting from persons crossing from Congo though not recognized as refugees by the government.
4	Production	The project should consider provision of technology and machines for agriculture. NAADS gave Terego one tractor and the cost of hiring the tractor is high.
5	Roads	The district has challenge with their roads. Even in dry season, the dust can be deep to cause vehicles to get stuck.
6	Disasters	Zombo experiences hailstorms every rainy season as a unique disaster.
7	Finance, Administration, general project operations and design	Persons who cross from Congo have increase in the community. Fear for lack of accountability and transparency at all levels. GRC at district and subcounty level though not effective as expected ( <b>GOU Regulations and ESS 10</b> ). Hard to reach places e.g., Anyolo, Akaa and Atyak Sub-county. Request for better planning of reception facility for refugees. NUSAF IV should cater for youth who are being skilled under presidential initiative in the various subjects since they are not given anything after the training. Restriction lending amounts from VSLAs VSLA does not allow borrowing more than 30% of what has been saved. Youths should be supported more, and the government should open regional industrial programmes to employ youths. Now many of them travel to Namanve and Jinja for employment. Fears of Centralised procurement of certain supplies which limits support for local content and in agriculture may increase failure of some enterprises. Project leaving other areas when limited to watersheds. Request to include the RDC, DISO RWC and refugees in monitoring of project to increase on inclusion of leaders at various leaders.
8	Community Based, social and beneficiary targeting	Persons who cross from Congo have increased in the community and are causing a lot of pressure on the services offered to the community, yet the resources are limited. Government does not recognize those who cross borders as refugees, and it affects the quality services rendered to the community. The project should therefore recognize this and support the district. All targeted beneficiaries in the project should have training on mindset change and sensitization. Some of the benefits should be in bits and the beneficiaries should be sensitised on how to plan the use of their incomes.


		<p>Marginalized group in the region are the Lendu in Akaa Sub- County.</p> <p>Many youths do not like groups. Some youths were suggesting being targeted as individuals but the members recommended groups. Groups should be based on interest of enterprises.</p> <p>Approach the improvement of participation through mindset change.</p> <p>Using existing groups might mean the same groups benefiting multiple times from multiple interventions/projects. Targeted groups should be profiled properly to know what they are benefiting on/from to determine if they qualify for new opportunities.</p> <p>Project coverage should be beyond the watersheds. (This is a confirmation that people no longer settle along the water bodies only.)</p>
9	Planning Units, ICT and communications	<p>Media stations to consider for communication in the region include Radio Paidha, Maria, Aulogo FM, Amani, Usalama (Mainly for refugees) and West Nile TV</p> <p>Languages to consider: Alur, Kebu, Lendu (Minority), Madi, in Atyak SC, Swahili, Lugbara ti, Kakwa, Arabic for refugees and Swahili and Lingala along the borders <b>(ESS 10)</b>.</p> <p>Time: Morning hours are not good for meeting community members</p>
10	Physical cultural resources	<p>The sensitive PCRs mentioned to be considered while implementing the project include;</p> <p>Rateng cultural site in Paidha</p> <p>Omweso pi: Hot springs in Atyak SC</p> <p>Ngbungbu falls on river Ora in Angol Parish, Atyak SC</p> <p>Blacksmith in Palwo Lendu parish Zeu SC and Jupalnatho parish in Akaa SC</p> <p>Alur kingdom palace in Atyak SC</p> <p>Magwar tomb site: Nyapea SC ancestral King of Paidha chiefdom called Amua Chiefdom.</p> <p>Ngbungbu river falls on river Nyagak in Paidha SC.</p> <p>Kebu cultural blacksmith in Kango SC, Alur cultural dance Winam Atyak SC</p> <p>Ngira Hill – Warr SC. Has snakes and cultural trees that should never be cut down.</p> <p>Tom of Jalusiga Atyak SC in Atyak Kal.</p> <p>Ngiri tomb – Afere parish</p> <p>Alworonga tomb: Warr town</p> <p>Adoka waterfall in Kango</p> <p>Alur Kingdom Palace in Atyak</p> <p>Shea tress</p> <p>Agu hill</p> <p>Water bodies (Nyagak river etc)</p> <p>Mahogany trees</p> <p>Lateng hill</p> <p>Winam palace of Alur Kingdom Tourist attraction and proposed site for Alur Mausoleum, royal drums and other royal relics.</p> <p>Ritual tressts</p> <p>Amuru hot springs, Pekele SC</p> <p>Cultural institutions in Pakele, Palaro Cultural Institution</p> <p>Okuturu rock cultural site</p> <p>Chief burial grounds in Pakele</p>

		Omi near the riverbank. For any activities around the area, permission must be obtained from cultural leaders East Madi wildlife Zoka central forest reserve (ESS 8)
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**Appendix 6: Pictorial Evidence of Stakeholders Engaged**  
Stakeholder Consultations in Bunyoro and West Nile regions

Photo	Narration
	Consultations with sub county officials in Kakumiro DLG.
	Consultations with Adjumani Officials


Stakeholder Consultations in Karamoja Region

Photo	Narration / Remarks
	Consultations in Napak District
Photo	Narration / Remarks

Stakeholder consultations in Elgon Region

PHOTOGRAPH	NARRATION
	<p>SAS Bukibino Sub-county in Bududa DLG addressing the NUSAF IV consultative meeting</p>

North Karamoja/ Teso Stakeholder Engagements

KAABONG DLG	
	<p>Timu Sub-County Consultations</p>

## **Appendix 7: Guidelines for Implementing Mitigation Measures to Address AHA-Related Risk**

In July 2024, following the enactment of the Anti-Homosexuality Act (AHA) of 2023, the Environmental and Social documentation and its annexes including ESMF, RPF, SEPs, POMS etc. for all ongoing projects in the Ugandan portfolio now include specific measures to mitigate the risk of discrimination against or exclusion of any affected individuals and groups in providing or receiving benefits in World Bank-financed projects and programs in Uganda. This SEP for NUSAF IV includes such mitigation measures in various sections as appropriate.

This appendix highlights recent actions and circulars issued by the GOU to ensure inclusion and non-discrimination of vulnerable or marginalized individuals or groups. It also includes transcripts of relevant Guidelines and Circulars issued by the GOU.

The Anti-Homosexuality Act was passed on May 26, 2023. The Government has continued to ensure inclusion and non-discrimination in all its projects and consistent with this, the Government has taken the following measures:

- **Letter of Assurance** (Sept 21, 2023) to all Ministries, Agencies, and local governments to implement mitigation measures on non-discrimination in WB-financed operations.
- **Budget execution circular** (July 10, 2023) to all public servants to ensure that projects are in line with Ugandan Constitution which emphasizes equality of all persons without prejudice or discrimination.
- **Circular on provision of health services** (June 5, 2023) that includes measures not to discriminate or stigmatize any individuals who seek health care for any reason.
- **Circular on provision of education** (August 18, 2023) services to all people without discrimination and exclusion in the delivery of education services, programs, and projects.
- **Circular issued by the Director of Public Prosecutions** (August 29, 2023) stating that prosecutors should seek guidance from ODPP before decision to charge is made under the AHA.

The measures involve ensuring access to a project-level Grievance Redress Mechanism (GRM), establishing a dedicated hotline for receiving AHA-related complaints, requiring contract clauses and codes of conduct on nondiscrimination, and training project workers and contractors and community outreach activities on Inclusion and Nondiscrimination (IND).

Through a competitive process, the World Bank and International Finance Corporation (IFC) have contracted an international firm SREO Consulting Ltd. (SREO) to

support the implementation of the mitigation measures. SREO will partner with local Civil Society Organizations (CSOs) and/or individuals with expertise and experience in inclusion and nondiscrimination in Uganda.

The World Bank will support the Ugandan government in the rollout of the mitigation measures through Enhanced Implementation Support and Monitoring (EISM), targeting PIUs including the TST for NUSAF IV, contractors, subcontractors, frontline service providers, and local stakeholders, as required and set out in the environmental and social documentation.



This annex presents guidelines on how to implement the mitigation measures, including main steps and the roles and responsibilities of task teams, the Ugandan government, PIUs/TSTs, the World Bank, CSOs, SREO, and other stakeholders.

### **Steps for Implementing Mitigation Measures**

Depending on the status of a particular project, the following steps may or may not be followed sequentially. One or more of the steps might not be relevant to a project, or it might be possible to accomplish two or more steps at the same time.

SREO and the relevant World Bank task team leader, social development specialist, and PIU/TST should discuss and agree on the relevance and sequence of steps prior to their implementation.

#### **1. Assess the Status of the Project**

The approach, type, and level of effort will vary depending on a project's implementation status:

- **Ongoing projects.** Ongoing projects require retrofitting to include mitigation measures. Such projects should be considered high priority for monitoring because of the existing risk of discrimination.
- **Early-stage projects.** Projects at an early stage of implementation require retrofitting to include mitigation measures, but the need for monitoring is not as urgent as for ongoing projects. The priority level for early-stage projects will depend on the status of activities on the ground and whether or not a PIU and service providers are in place.
- **Closing and closed projects.** Projects that have closed since the enactment of the AHA or that will be closing in the next six months require a due diligence review to assess if there are any outstanding complaints or issues related to the discrimination of vulnerable or marginalized individuals or groups and if any remedial measures are needed.

The results of the due diligence should be incorporated into the standard environmental and social closure review unless it has been completed already. No further action is needed.

- **Pipeline projects.** A project that has not yet begun implementation provide the opportunity to integrate AHA risk mitigation measures and monitoring into its design.

NUSAF IV as a pipeline project has presented such an opportunity to integrate these mitigation measures and monitoring into its design.

#### **2. Enhance Existing Project-Level Grievance Redress Mechanisms and Establish a Hotline**

SREO will distribute a questionnaire to World Bank and PIU/TST social development specialists to assess existing project-level GRMs. Based on a review of responses, it will recommend actions that the PIU/TST or service providers can take to improve the GRMs.

With the support of SREO, the PIU/TST and the social development specialist will revise the project GRMs to include effective, safe, ethical, and confidential referral pathways, ensuring that vulnerable or marginalized individuals or groups following the enactment of the AHA feel secure reporting incidents and that grievances are addressed quickly, efficiently, and appropriately.

SREO will provide training to GRM staff so they can recognize AHA-related complaints and route them to the EISM. The enhanced process will enable the PIU/TST to identify complaints of exclusion or discrimination sent to the GRM and forward them to SREO within 48 hours of receipt.

### **Hotline on Discrimination and Exclusion**

SREO has designed and operates a hotline (0800 333125) as an alternative way to receive complaints about the exclusion or discrimination of vulnerable or marginalized individuals or groups following the enactment of the AHA, related to accessing benefits, services, or opportunities in World Bank/IFC operations. The design of the hotline will allow it to:

- Receive complaints in a confidential, anonymous, and nonjudgmental manner that is sensitive to local context and available in four local languages.
- Compile detailed monthly reports of complaints.
- Advise complainants on remedial actions.
- Map available services for vulnerable or marginalized individuals or groups following enactment of the AHA, including counseling, legal services, and protection.
- Refer individuals to appropriate local services or organizations.
- Implement a data privacy and protection policy that includes confidentiality clauses which must be signed by all personnel handling referrals.
- Establish a data management system that guarantees safety through secure encryption and privacy protocols.
- Develop specific security protocols to ensure communications are safe, ethical, and confidential.
- Ensure all grievance mechanisms have appropriate whistle-blower protection protocols in place that enable safe reporting.

**World Bank’s Grievance Redress Service.** In addition to the enhanced project-level GRM and the dedicated hotline, the World Bank has developed a specific window under its existing Grievance Redress Service (GRS) to manage complaints related to any World Bank project globally. A protocol has been developed to process all complaints related to exclusion or discrimination of vulnerable or marginalized individuals or groups following enactment of the AHA of 2023, in the Uganda portfolio.

### **3. Conduct Outreach and Sensitization Activities**

The World Bank team, PIUs/TSTs, and service providers should contact SREO to assist with:

- The preparation and implementation of a plan to disseminate information about existing GRMs and the dedicated hotline
- The development and implementation of outreach activities on nondiscrimination delivered to beneficiaries and communities in a safe, ethical, and confidential manner.

#### **4. Strengthen Capacity and Deliver Technical Support**

The World Bank team, PIUs/TSTs, and service providers should contact SREO to assist with:

- Training workers, contractors, and project-level GRM staff on nondiscrimination and inclusion, including developing training materials, identifying venues, and hiring trainers.
- Delivering any other needed technical support related to the implementation of the mitigation measures.

SREO will prepare training modules for call center operators, data management personnel, and community outreach personnel on the appropriate handling of sensitive information given the AHA context.

#### **5. Conduct Monitoring and Evaluation**

Task team leaders, social development specialists, PIUs/TSTs, and service providers should contact SREO to:

- Support the monthly and quarterly monitoring and evaluation of the implementation of agreed measures and actions to mitigate the risk of exclusion and discrimination and to reduce incidents of discrimination or exclusion due to the AHA.
- Provide comments on regular evaluations of the effectiveness of mitigation measures.
- Offer feedback on recommendations and support the implementation of adjustments to mitigation measures based on their effectiveness.

#### **6. Take Remedial Action**

When a discrimination or exclusion complaint is reported to the dedicated hotline, the following process should be followed:

- SREO will report the grievance to the World Bank, propose appropriate remedial actions, and follow up on agreed actions to resolve the case.
- The World Bank's EISM coordinator and country manager will assess the complaint and then forward it to the Ministry of Finance, Planning and Economic Development. If the Ministry does not object to the World Bank's recommendations, they will be forwarded to the PIU/TST.
- The PIU/TST is responsible for implementing the agreed measures, which might include training and retraining, hiring, offering financial compensation, providing service referrals, taking disciplinary actions, and providing access to project services and benefits.

#### **Roles and responsibilities for the Implementation of Mitigation Measures**

The different steps presented are guidance on the how to do and the sequencing for the implementation of the mitigation measures bearing in mind that the sequencing can vary from one project to another, and activities done in parallel in some instances. Each Step identifies the roles

and responsibilities of the GOU, PIU/TST, WBG, CSOs and SREO. The roles and responsibilities are summarized in this section and in table 11.

This section also provides more specific information on roles and responsibilities to implement the mitigation measures of the EISM firm SREO and the PIUs/TST. The mitigations measures identified in the Projects' environment and social instruments will be implemented by the GOU through the PIU/TST with the support of the EISM firm RSEO hired by the World Bank with collaboration of NGO/CSOs and country-based development partners in implementing these mitigation measures. SREO's specific responsibilities include:

- Helping project teams improve existing project-level grievance redress mechanisms, and developing and operating an independent mechanism to identify, manage, and monitor cases of discrimination.
- Developing a robust data management system and process that secures personal data and information safely, ethically, and confidentially.
- Working with the World Bank to strengthen the capacity of PIUs/TSTs, workers, contractors, subcontractors, and service providers.
- Ensuring that contracts, codes of conduct, hiring procedures, whistle-blower protections, and all other needed protocols are in place to remediate cases of discrimination.
- Supporting the World Bank in monitoring the efficacy of the agreed mitigation measures.
- Reporting complaints of discrimination to the World Bank, proposing appropriate remedial actions, and following up on agreed actions to resolve cases.

With the support of SREO, PIUs/TSTs are responsible for implementing mitigation measures as described in the environmental and social instruments, including:

- Developing training, sensitization, information, educational, and communication materials on the principle of nondiscrimination of individuals or groups who are vulnerable or marginalized.
- Conducting consultations on nondiscrimination with targeted external stakeholders, including NGOs, CSOs, local governments, and other stakeholders, as appropriate.
- Integrating clauses on nondiscrimination and codes of conduct on nondiscrimination into all project contracts, which must be signed by all contractors, subcontractors, and service provider staff.
- Reviewing all relevant policy and protocol documents, including those for human resources and whistle-blower protections.
- Facilitating the monitoring of all measures to ensure their implementation, that all reported incidents are shared with the World Bank, and that they are addressed promptly.

**Table 11: Roles and Responsibilities for the Implementation of Mitigation Measures**

***Government of Uganda***

- Facilitating the implementation of mitigation measures under the leadership of the Ministry of Finance, Planning and Economic Development and through PIUs.
- Following up on reported cases of discrimination in coordination with the World Bank EISM coordinator and country manager.
- Achieving agreement with the World Bank on remedial actions and forwarding recommendations to PIUs.

***Project Implementation Units/Project Implementation Support Teams***

- Reviewing and enhancing project-level GRMs.
- Ensuring the implementation of mitigation measures.
- Facilitating capacity strengthening and community outreach efforts.
- Implementing agreed-on remedial actions and measures.

***World Bank (task team leaders, social development specialists, and the EISM coordinator)***

- Supporting capacity strengthening and training sessions.
- Facilitating communication between SREO and the Ugandan government, SREO and task team leaders, and SREO and PIUs/TSTs.
- Overseeing the remediation of reported cases, makes recommendations, and follows up to ensure their resolution.

***Civil Society Organizations***

- Hired by the EISM firm (SREO) to coordinate the monitoring of activities in Uganda.
- Participate in capacity-building and outreach activities to disseminate information about the hotline and the GRS to relevant populations.
- Receive and manage referrals for issues outside the EISM's scope.

***SREO Consulting, Ltd.***

- Establishes a dedicated hotline and assists PIUs/TSTs in improving existing GRMs.
- Conducts outreach and sensitization activities.
- Provides capacity-strengthening and technical support to PIUs/TSTs.
- Monitors and evaluates discrimination complaints.

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In any correspondence on  
This subject please quote No. ALD 141/259/01 TC



Ministry of Finance, Planning &  
Economic Development,  
P.O. Box 8147  
Kampala, Uganda

21<sup>st</sup> September 2023

The World Bank Country Manager  
Uganda Country Office  
**Kampala, Uganda.**



### **UGANDA'S SOCIAL SAFEGUARD POLICIES**

I am writing in reference to the above subject. Further reference is made to our letter dated 28<sup>th</sup> July, 2023 on the same.

Government of Uganda wishes to reiterate that World Bank-financed projects will be implemented in a manner consistent with the principles of non-discrimination within the provisions of Article 21 of our Constitution.

The Government confirms that it will ensure that under these projects, no person will be discriminated against or stigmatized and that the principles of non-discrimination and inclusion will be adhered to. The Public Finance Management Act, 2015 also emphasizes equality of all persons to access opportunities and benefits from projects and programs without prejudice and discrimination.

Further to the above, we have issued the attached instructions to all implementing entities of Government projects and programs which communicate about specific mitigation measures to take and the legal requirement for non-discrimination.

Please accept Country Manager, the assurances of my highest consideration and esteem.

A handwritten signature in blue ink, appearing to read 'RAMATHAN GGOOBI'.

Ramathan Ggoobi

**PERMANENT SECRETARY/SECRETARY TO THE TREASURY**

Rt.Hon. Prime Minister, Office of the Prime Minister

Attorney General, Ministry of Justice and Constitutional Affairs

Hon. Minister of Finance Planning and Economic Development

---

**Mission**

*"To formulate sound economic policies, maximize revenue mobilization, ensure efficient allocation and accountability for public resources so as to achieve the most rapid and sustainable economic growth and development"*

Hon. Minister of Education and Sports

Hon. Minister of Health

Hon. Minister of Gender Labour and Social Development

Hon. Minister of Energy and Mineral Development

The Principal Private Secretary to H.E. the President

Solicitor General, Ministry of Justice and Constitutional Affairs

The Director of Public Prosecutions

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Ministry of Finance, Planning &  
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P.O. Box 8147  
Kampala, Uganda

ALD 141/259/01 TC

21<sup>st</sup> September 2023

All Accounting Officers  
All Ministries, Departments and Agencies  
All Local Governments



### **UGANDA'S SOCIAL SAFEGUARD POLICIES**

I am writing in reference to the above subject. Further reference is made to the Anti-Homosexuality Act, 2023 (AHA) that came into force on 30<sup>th</sup> May 2023.

Following the World Bank Group's concern with Uganda's enactment of the Anti-Homosexuality Act, 2023 and as communicated in the Budget Execution Circular of FY 2023/2024 on 18<sup>th</sup> July 2023, we guide that;

- All World Bank-financed projects must be implemented in a manner consistent with the principles of non-discrimination as provided under Article 21 of the Constitution of the Republic of Uganda. These projects should also be implemented in accordance with World Bank policies and applicable Legal Agreements.
- Under these projects, no person will be discriminated against or stigmatized and the principles of non-discrimination and inclusion will be adhered to. Support should be provided to all project beneficiaries.
- All implementing entities of World Bank projects will implement specific mitigation measures to address non-discrimination.
- These mitigation measures will require enhancing project grievance redress mechanisms as well as strengthening existing project monitoring by implementing entities including third-party monitoring where applicable.
- Each project implementing entity shall develop comprehensive guidelines to address non-discrimination.

*Mission*

*"To formulate sound economic policies, maximize revenue mobilization, ensure efficient allocation and accountability for public resources so as to achieve the most rapid and sustainable economic growth and development"*



## **Specific Measures for High Risk Sectors**

### **Health**

- The Ministry of Health issued a circular on August 8, 2023 that guarantees access to health care services for all and prohibits the discrimination or stigmatization of any individual who seeks health care services on any grounds.
- The Ministry of Health will widely disseminate and socialize health sector guidelines for the effective implementation of the circular.
- Implementating entities should strengthen grievance redress mechanisms, and third-party monitoring systems in collaboration with national and international partners.

### **Education**

- The Permanent Secretary in the Ministry of Education and Sports on 18<sup>th</sup> August 2023 issued a circular stating that the Ministry of Education and Sports does not permit any form of discrimination against any persons in the delivery of education services, programs and projects.
- In light of that circular, the Ministry should ensure that there is no discrimination (including any form of bullying) against teachers and students on any grounds.
- The Ministry of Education and Sports will prepare project specific guidelines to address non-discrimination.
- Implementating entities should strengthen grievance redress mechanisms, including an independent hotline and third-party monitoring systems where necessary.



Ramathan Ggoobi

**PERMANENT SECRETARY/SECRETARY TO THE TREASURY**

Rt. Hon. Prime Minister, Office of the Prime Minister

Attorney General, Ministry of Justice and Constitutional Affairs

Hon. Minister of Finance, Planning and Economic Development

Hon. Minister of Education and Sports

Hon. Minister of Health

Hon. Minister of Gender, Labour and Social Development

Hon. Minister of Energy and Mineral Development

The Principal Private Secretary to H.E. the President

The Solicitor General, Ministry of Justice and Constitutional Affairs

The Permanent Secretary, Ministry of Health

The Permanent Secretary, Ministry of Education and Sports

The Permanent Secretary, Ministry of Gender, Labour and Social Development

The Director of Public Prosecutions

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In any correspondence or  
This subject please quote No.



Ministry of Finance, Planning &  
Economic Development,  
P.O. Box 8147  
Kampala, Uganda

BPD 86/179/01

10<sup>th</sup> July, 2023

All Accounting Officers (Central Government, Missions Abroad, and Local Governments)

All Chief Executive Officers of State-Owned Enterprises and Public Corporations

## THE BUDGET EXECUTION CIRCULAR (BEC) FOR FINANCIAL YEAR 2023/2024

### A. INTRODUCTION

1. This Circular is issued in fulfilment of Article 155 (1) of the Constitution, and Sections 13 (5) and 14 (1) of the Public Finance Management Act, 2015 (Amended).
2. The theme for the FY 2023/2024 Budget has been retained as: **"Full Monetization of the Ugandan Economy through Commercial Agriculture, Industrialization, Expanding and Broadening Services, Digital Transformation and Market Access"**. The Budget for FY 2023/2024 was approved to address the strategic mission of facilitating more Ugandans to join the money economy.
3. The purpose of this Circular is to communicate the following:
  - i. The FY 2023/2024 Annual Cash Flow Plan (**Annex 1**);
  - ii. The Policy, Operational and Administrative Guidelines for execution of the Budget in FY 2023/2024.
4. As you execute the Budget for FY 2023/2024, I urge all Accounting Officers to ensure that all program activities contribute towards addressing the following objectives:
  - i. Completion of public investments with higher multiplier effects on attainment of NDPIII and the NRM 2021-2026 Manifesto;
  - ii. Full-scale implementation of the Parish Development Model (PDM);
  - iii. Enhanced revenue mobilization and collection; and



Minister

*"To formulate sound economic policies, ensure revenue mobilization, ensure effective allocation and accountability for public resources so as to achieve the most rapid and sustainable economic growth and development"*

- iv. Ensuring efficiency and effectiveness of Government through rationalization of public expenditure.
5. The key priorities to achieve the above objectives are detailed in the approved Budget for FY 2023/2024. For ease of reference, please follow the link <https://www.budget.finance.go.ug> to access the following key documents, among others:
  - i. The Budget Speech for FY 2023/2024;
  - ii. Approved Estimates of Revenue and Expenditure Volume I (Central Government Votes and Missions Abroad);
  - iii. Approved Estimates of Revenue and Expenditure Volume II (Local Governments); and
  - iv. Approved Estimates of Revenue and Expenditure Volume III for the State-Owned Enterprises and Public Corporations.

#### **B. THE ANNUAL CASH FLOW PLAN FOR FY 2023/2024**

6. In accordance with Section 36 (b) of the PFM Act 2015 (Amended), the Annual Cash Flow Plan for FY 2023/2024 has been generated off the Program Budgeting System (PBS) based on the quarterly projections in your respective Vote work plans for FY 2023/2024.
7. The purpose of the Cash Flow Plan is to guide and ensure that Government maintains sufficient liquidity to be able to sustain and make timely payments to meet service delivery requirements by aligning Vote cash inflows and outflows to your respective Program Implementation Action Plans (PIAPs).
8. In view of the above, and in line with Sections 15 and 21 (i) of the PFM Act, 2015 (Amended), all Accounting Officers are urged NOT to overcommit the vote budgets beyond the Annual Cash Flow Plan issued in this Circular. Furthermore, you should submit expenditure commitments, in line with the PIAPs, indicating the actual forecast commitments and the cash position of your respective Votes as per Section 16 (i) of the PFMA, 2015 (Amended) to inform decision-making on the subsequent quarterly expenditure releases.



**C. POLICY DIRECTIVES, ADMINISTRATIVE AND OPERATIONAL GUIDELINES FOR IMPLEMENTATION OF THE BUDGET FOR FY 2023/2024**

***Policy Directives***

9. The FY 2023/2024 Budget allocations directed resources to program areas meant for enhanced socio-economic transformation for all Ugandans through job and wealth creation, and increasing household incomes, by targeting the 39% of Ugandans still in the non-money economy. All Accounting Officers are urged to adhere to the following policy directives that guided the preparation of the Budget for FY 2023/24:
- i. Fund key Government priorities to increase the momentum in socio-economic transformation, for example: the standard-gauge railway, the meter-gauge railway, solar-powered irrigation, PDM, *Emyooga*, road maintenance, coffee value addition, vaccines and pharmaceutical manufacturing etc.;
  - ii. Support development initiatives that drive private sector growth;
  - iii. Implement only ongoing projects and other multi-year commitments as approved in the Budget;
  - iv. Halt new non-concessional projects, except those already provided for in the fiscal framework, or those with no direct or indirect claim on the Consolidated Fund;
  - v. Hold back any recruitment plans in FY 2023/2024 except on a replacement basis where the resources are already available;
  - vi. No travel abroad, except for critical positions of the Executive, Legislature, Judiciary, security, diplomatic relations and resource mobilization; and
  - vii. **NO** purchase of new vehicles except hospital ambulances, tailored vehicles for medical supplies/distribution, and for agricultural extension services, security and revenue mobilization.

***Non-Discrimination***

10. Accounting Officers should ensure that all projects (whether Government of Uganda or externally funded) are implemented within the provisions of Article 21 (1) and (2) of the Constitution and Section 13 (11) (e) (i-ii) of the Public Finance Management Act, 2015 (Amended). This emphasizes equality of all persons in access to all opportunities and benefits presented by the above projects, without prejudice and discrimination on the ground of sex, race,

color, ethnic origin, tribe, birth, creed or religion, social or economic standing, political opinion or disability.

*Advertising by Ministries, Agencies and Local Governments*

11. In his letter of Ref. No. PO/3 dated 6<sup>th</sup> March 2023, H.E. The President directed that in FY 2023/2024, **“all Government advertising must be through the Uganda Broadcasting Corporation. Any Accounting Officer who deviates from this will be sanctioned including dismissal”**. Print media advertising should be done through the New Vision. I therefore urge all Accounting Officers to strictly adhere to this directive.

*Contracting in Ugandan Shillings versus Foreign Currencies*

12. I have received numerous requests from a number of Ministries, Departments and Agencies (MDAs) to undertake contracts in foreign currency, especially in United States Dollars and Euros. In line with the fiscal and monetary policies agreed with Bank of Uganda, I wish to reiterate this Ministry's position that no procurements should be undertaken in foreign currency as previously communicated in FY 2016/17, FY 2017/18 and FY 2018/19. Contracting in the local currency, is meant to preserve the sanctity and value of the Shilling since the budget is appropriated in the local currency which is easily convertible.
13. Therefore, this is to guide all Accounting Officers as follows:
  - i. **That all contracts for works, goods and services shall be awarded in Ugandan Shillings to hedge against cost overruns due to global forex rates fluctuations that impact on the stability of the Shilling; and**
  - ii. **All contracts, including those that follow international competitive bidding procedures, shall be quoted in Ugandan Shillings. The only exemption will be where it is clearly expressed in the financing agreements with Development Partners to use other currencies in the bidding process, if necessary. This should be strictly the exception and not the norm. I request the Honorable Attorney General's chambers to take note and enforce this guideline while approving agreements.**



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IN ANY CORRESPONDENCE ON



Ministry of Health  
P. O. Box 7272  
Plot 6, Lourdel Road  
KAMPALA  
UGANDA

THIS SUBJECT PLEASE QUOTE NO. **ADM:180/01**

THE REPUBLIC OF UGANDA

5<sup>th</sup> June 2023

### Circular

All Hospital Directors, National and Regional Referral Hospitals  
All District Health Officers  
All Medical Superintendents  
All Health Facility In-charges  
Executive Directors of Implementing Partners  
Executive Directors of Faith Based Medical Bureaus  
The Executive Director Uganda Healthcare Federation

### PROVISION OF SERVICES TO ALL PEOPLE WITHOUT DISCRIMINATION

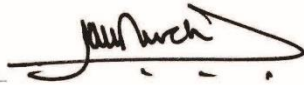
The constitution of the republic of Uganda recognises that health is a fundamental right and guarantees access to health care services for all. The Ministry of Health is mandated to provide Preventive, Promotive, Curative and Rehabilitative Health Services to all people in Uganda in their diversity **without any form of discrimination**. Furthermore, all services should be provided in a manner that ensures **Safety, Privacy and Confidentiality to all clients that seek health services in all facilities, both Public and Private.**

The Ministry of Health therefore reminds all health care workers and stakeholders about the above National commitments, and reiterates the following;

- **Not to deny services to ANY client who present themselves for services.**
- **Not to discriminate or stigmatize any individual who seeks health care services, for any reason – gender, religion, tribe, economic status, social status or sexual orientation.**
- **Patient rights and ethical values – Confidentiality, Privacy, Patient Safety as stipulated in the Patient's Charter should be upheld each time a patient seeks health care services at your facility**

Your cooperation in this matter is of great importance to improving access to service delivery for all our people.

A handwritten signature in black ink, appearing to be 'M. N. N.', written over a horizontal line.



Dr. Henry G. Mwebesa  
**DIRECTOR GENERAL HEALTH SERVICES**

- cc. Hon. Minister of Health  
Hon. Minister of State for Health (GD)  
Hon. Minister of State for Health (PHC)  
Permanent Secretary, Ministry of Health  
All UN Agencies  
PEPFAR Coordinator  
Head Country Team Global Fund, Geneva  
Country Manager, World Bank  
Country Director – CDC, USAID, DOD  
Director General, Uganda AIDS Commission  
Directors, Ministry of Health  
All Chief Administrative Officers  
Registrars, Health Professional Councils



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In any correspondence on  
this subject please quote: EPD 191/336/03



**Ministry of Education and Sports**  
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**Website: [www.education.go.ug](http://www.education.go.ug)**  
**Kampala, Uganda**

18<sup>th</sup> August 2023

All Heads of Education Institutions

### **PROVISION OF EDUCATION SERVICES TO ALL PEOPLE WITHOUT DISCRIMINATION**

The Government of Uganda recognizes the Constitutional social objective to ensure all Ugandans enjoy rights, opportunities and access to education. Under our education objectives, the State is obligated to promote free and compulsory basic education, afford every citizen equal opportunity to attain the highest educational standard possible, and facilitate individuals, religious bodies and other non-governmental organizations to found and operate educational institutions if they comply with the general educational policy of the country and maintain national standards.

The Ministry is implementing the Gender in Education Policy which provides for equitable access to education for all without discrimination. To operationalize the Policy a number of policy strategies and guidelines exist including the National Strategy of Elimination of Violence Against Children, the Life Skills Toolkit, manuals on growth and sexual maturation. In addition, the Ministry has incorporated Sexuality Education into the curriculum to ensure age-appropriate information to enable young people to maneuver through the different challenges of life.

The purpose of this Circular, therefore, is to reiterate Article 21 (1) of our constitution with states that "All persons are equal before and under the law in all spheres of political, economic, social and cultural life and in every other respect and shall enjoy equal protection of the law". The Ministry does not condone any forms of discrimination and exclusion of any persons, in delivery of education services, programs and projects.

You are, therefore, called upon to observe and ensure the above standards in the delivery of education services, programmes and projects.

**Ketty Lamaro**  
**PERMANENT SECRETARY**

Cc: First Lady and Hon Minister of Education and Sports  
Ministers of State, Education and Sports

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Our Ref: ADM 12/01  
Your Ref:

Date: 25<sup>th</sup> August, 2023

### CIRCULAR NO.18/2023

All Prosecutors,  
Office of the Director of Public Prosecutions.

**RE: MANAGEMENT OF CASES WITH CHARGES PREFERRED UNDER THE ANTI-HOMOSEXUALITY ACT 2023.**

The Anti-Homosexuality Act (AHA) came into force on 30<sup>th</sup> May 2023. It has come to the attention of management that a number of charges of Homosexuality and Aggravated Homosexuality are now being preferred by some officers without internalizing some crucial aspects of the act.

It is important to note that the AHA only criminalises offences where a sexual act has been performed. The term "*sexual act*" is defined under Section 1 of the Act.

It is also important to note that Sections 2 (5) and 3 (5) of the AHA provide that "*for the avoidance of doubt, a person who is alleged or suspected of being a homosexual, who has not committed a sexual act with another person of the same sex, does not commit the offence of homosexuality under this section*".

Officers are therefore advised to peruse files with offences under the AHA cautiously while taking into account the abovementioned provisions.

You are hereby directed to ensure that all files with charges preferred under the AHA should first be submitted to Headquarters with a written legal opinion for further guidance before a decision to charge is made.

Management will soon organize sensitization meetings for all officers on the key aspects of the AHA.

A handwritten signature in black ink, appearing to read 'JFABODO'.

Jane Frances ABODO  
DIRECTOR OF PUBLIC PROSECUTIONS

## **Annex 13: Enhanced Implementation Support and Monitoring on Non-Discrimination**

The World Bank and IFC have hired an international and credible entity (firm, agency) with a strong knowledge of the Ugandan context and a track record of enhanced third-party implementation support and performance monitoring to undertake the tasks described in this section for all projects presently being implemented in the Uganda portfolio. The entity is expected to work with NGO/CSOs and country-based development partners.

The Enhanced Implementation Support and Monitoring (EISM) will primarily focus on supporting project teams to implement mitigation measures to address grievances and concerns from beneficiaries, communities, and workers relating to discrimination from project benefits.

The objectives of the Enhanced Implementation Support and Monitoring include:

- Assisting project teams to enhance existing project-level grievance mechanisms and develop and operate an independent mechanism that would identify, manage, and monitor cases of discrimination.
- Assisting the WB in strengthening the capacity of PIUs, workers, and contractors, subcontractors, and service providers.
- Ensuring contracts, codes of conduct, hiring procedures, whistle-blower protection protocols, and other measures, as needed, are in place to allow remediation of cases of discrimination.
- Develop a strong data management system and process that secures personal data and information in a manner that is safe, ethical, and confidential.
- Where cases of discrimination are reported through the above mechanism, the EISM will report the grievances to the Bank, propose appropriate remediation, and follow up on agreed actions to resolve the cases.
- Support the WB/IFC to monitor the efficacy of the agreed measures to mitigate the impacts on WB/IFC financed operations.

Table 17 illustrates the enhanced implementation support and monitoring steps. Figure 8 contains the Enhanced Implementation Support and Monitoring process. Figure 9 contains the Complaint Management for vulnerable or marginalized individuals or groups.

### **1. SCOPE OF WORK AND ACTIVITIES**

To provide enhanced implementation and monitoring support to the World Bank/IFC operations in Uganda the EISM will:

1.1 Establish an effective and confidential mechanism to receive, manage, refer, and monitor grievances related to discrimination across the WB/IFC portfolio.

To do so the EISM will:

- Enhance existing project-level grievance redress mechanisms to safely, ethically, and coincidentally receive cases related to discrimination on World Bank/IFC financed operations

and refer them to an appropriate grievance handling mechanism.

- **Design and operate a mechanism for receiving grievances** related to discrimination on WB/IFC financed operations (including from project level grievance mechanisms noted above).
- **Establish a hotline or an alternative complaint mechanism**, for individuals to lodge complaints of discrimination on WB/IFC financed projects or voice their concerns without fear of reprisal. The EISM is an alternative to lodging complaints through a GOU-led project-level GRMs

**NOTE:** The EISM firm has established a nationwide GRM hotline – 0800 333125, designed specifically to receive grievances or concerns from vulnerable or marginalised individuals or groups that may be discriminated against or excluded from benefiting from all World Bank and IFC financed projects due to enactment of the AHA. The hotline is hosted and operated by a local NGO. The NUSAF IV Project will also benefit from the same hotline.

<b>Table 17: Enhanced Implementation Support and Monitoring Steps</b>	
Act as a key first step in the referral process from project-level GRMs	Designed specifically to handle complaints restricted to WB/IFC projects
Step 1	Receives and document complaints of discrimination in accessing WB/IFC projects' benefits, services, and opportunities.
Step 2	Develops specific security protocols to ensure that communications are safe, ethical, and confidential.
Step 3	Establishes a data management system on an international server guaranteed by the provider as safe and secure encryption and privacy.
Step 4	Implements a data privacy and protection policy to include confidentiality clauses to be signed by all personnel entrusted with managing referrals or referral-related information.
Step 5	Handles complaints in a confidential, anonymous, and non-judgmental manner which is sensitive to local context and in local languages.
Step 6	Provides detailed monthly reports of complaints received to the WB/IFC
Step 7	Provides ad hoc incident reports of all allegations to WB/IFC within 48 hours of receipt.
Step 8	Reports grievances to the WB/IFC, proposes appropriate remediation, and follows up on agreed actions to resolve the case.
Step 9	Maps available services for vulnerable or marginalized individuals or groups including counselling, legal services, protection, and other services.

Step 10	Refers individuals to the appropriate local services or organizations as needed.
Step 11	Regularly evaluates the effectiveness of mitigation measures to determine whether and how well the mitigation measures are functioning.
Step 12	Recommends and supports the implementation of adjustments to mitigation measures based on regular evaluations and their impact.

## 1.2 Outreach and sensitization to project beneficiaries and communities involved with the World Bank/IFC Bank/IFC Portfolios.

Activities related to Outreach and sensitization to project beneficiaries and communities include:

- **Assist the WB/IFC to prepare and implement a plan to disseminate information** about the support provided by the entity including support to existent GRMs.
- **Prepare community/beneficiary information materials** on their rights within the Constitution of Uganda and World Bank/IFC policies informed by various official circulars issued by the GOU on non-discrimination and World Bank/IFC policies.
- **Develop and implement a methodology to conduct periodic outreach to beneficiaries/communities** to hold consultations on non-discrimination to identify issues and risks in a safe, ethical, and confidential manner.

## 1.3 Capacity strengthening and technical support

Activities related to capacity strengthening and technical support include:

- **Support to the WB/IFC on training** of government staff and private sector consultants/clients, workers, and contractors on non-discrimination by developing training materials, identifying venues, providing trainers, etc.
- **Support to the WB/IFC with training project level GRMs** on non-discrimination in World Bank and IFC financed Projects by developing training materials, identifying venues, providing trainers, etc.
- **Preparing training modules for call center operators, data management personnel, and community outreach personnel** on appropriate handling of sensitive information.
- **Providing technical support to the GOU for the development of Guidelines on Nondiscrimination of Workers.**

## 1.4 Monitoring and Evaluation

Activities related to monitoring and evaluation include:

- **Developing a system to regularly monitor WB/IFC projects** for 1) implementation of agreed GOU actions to mitigate the risk of discrimination on WB/ IFC projects, 2) incidents of discrimination on World WB/IFC financed projects.
- **Regularly evaluating the effectiveness of mitigation measures** to determine whether and how well the mitigation measures are functioning to improve WB/IFC awareness of incidents of discrimination on WB/IFC financed operations.
- **Recommending and supporting the implementation of adjustments to mitigation measures** based on regular evaluations and their impact.

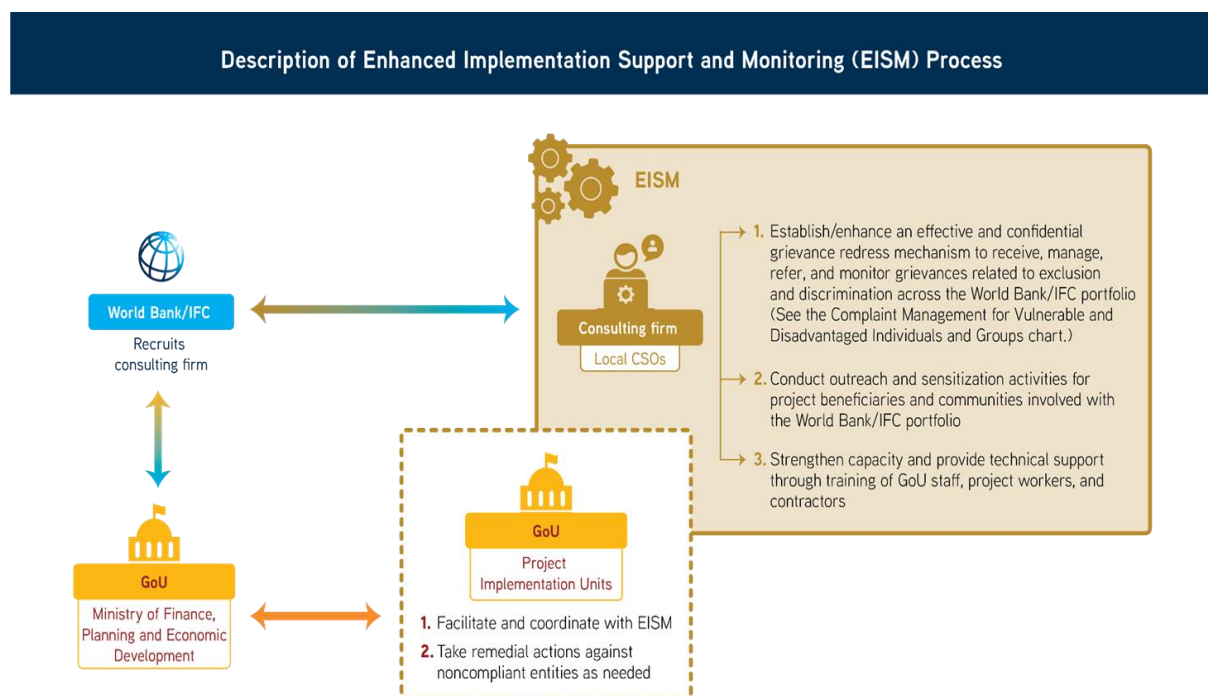
### 3. Roles and responsibilities

The GOU and its PIUs remain responsible for the implementation of all project activities including mitigation measures supported by the EISM. The enhanced implementation and monitoring support mandate is specifically focused on:

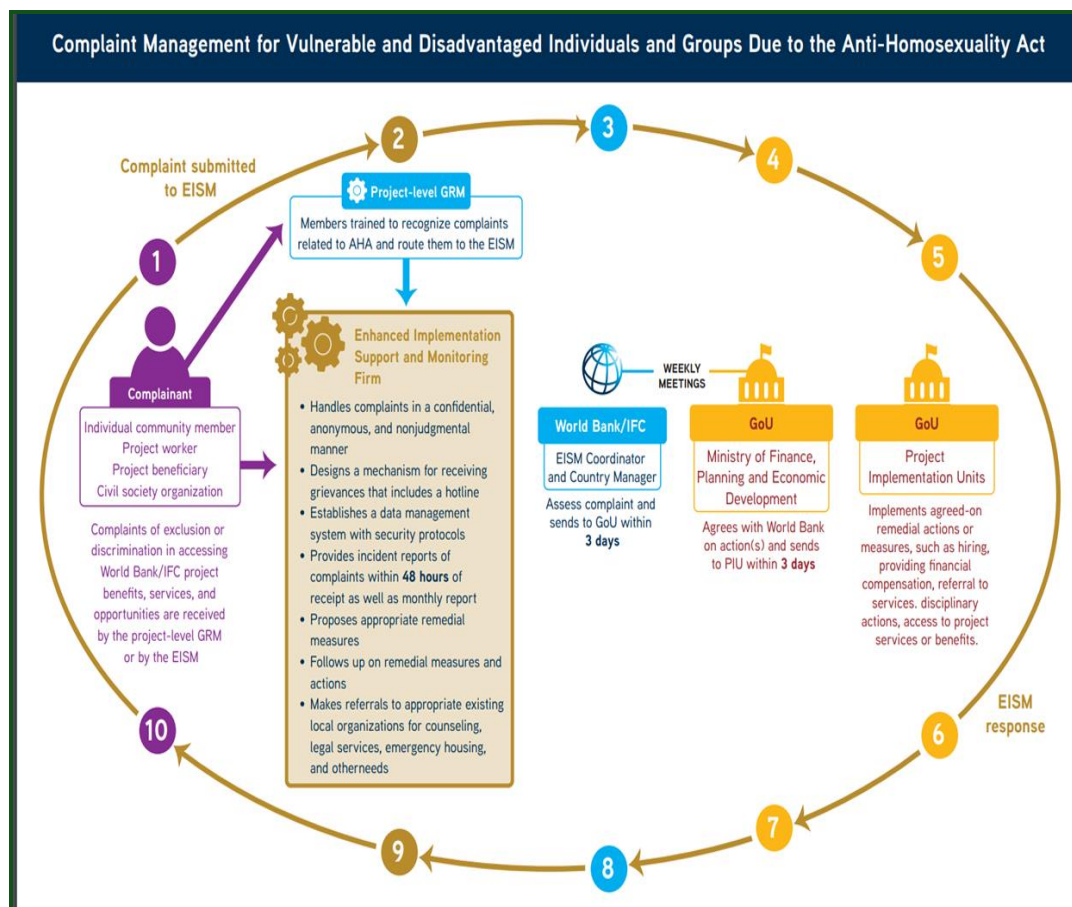
- 1) supporting the WB/IFC to ensure the agreed measures on non-discrimination in the portfolio are implemented fully, ethically, safely, and to an appropriate standard of quality; and
- 2) to support the WB/IFC to enhance our awareness of cases of discrimination across the WB/IFC portfolio.

The GOU will facilitate the work of the Entity and collaborate as needed on all activities requiring their direct involvement, such as outreach and sensitization activities, capacity strengthening and technical support as well as the monitoring and evaluation of mitigation measures. The GOU will also ensure that the work under the EISM can be undertaken safely in accordance with existing circulars and their dissemination.

**Figure 9: Description of Enhanced Implementation Support and Monitoring (EISM) Process**



**Figure 10: Complaint Management for Vulnerable and Disadvantaged Individuals or Groups due to AHA**



**Annex 14: Guidelines for Implementing Mitigation Measures to Address AHA-Related Risk**

In July 2024, following the enactment of the Anti-Homosexuality Act (AHA) of 2023, the Environmental and Social documentation and its annexes including ESMF, RPF, SEPs, POMS etc. for all ongoing projects in the Ugandan portfolio were updated to include specific measures to mitigate the risk of discrimination against or exclusion of any affected individuals and groups in providing or receiving benefits in World Bank-financed projects and programs in Uganda. This ESMF for NUSAF IV includes such mitigation measures in various sections as appropriate.

The measures involve ensuring access to a project-level Grievance Redress Mechanism (GRM), establishing a dedicated hotline for receiving AHA-related complaints, requiring contract clauses and codes of conduct on nondiscrimination, and training project workers and contractors and community outreach activities on Inclusion and Nondiscrimination (IND).

Through a competitive process, the World Bank and International Finance Corporation (IFC) have contracted an international firm SREO Consulting Ltd. (SREO) to support the implementation of the mitigation measures. SREO will partner with local Civil Society Organizations (CSOs) and/or individuals with expertise and experience in inclusion and nondiscrimination in Uganda.

The World Bank will support the Ugandan government in the rollout of the mitigation measures through Enhanced Implementation Support and Monitoring (EISM), targeting PIUs including the PIST for NUSAF IV, contractors, subcontractors, frontline service providers, and local stakeholders, as required and set out in the environmental and social documentation.

This annex presents guidelines on how to implement the mitigation measures, including main steps and the roles and responsibilities of task teams, the Ugandan government, PIUs/PISTs, the World Bank, CSOs, SREO, and other stakeholders.

## **Steps for Implementing Mitigation Measures**

Depending on the status of a particular project, the following steps may or may not be followed sequentially. One or more of the steps might not be relevant to a project, or it might be possible to accomplish two or more steps at the same time.

SREO and the relevant World Bank task team leader, social development specialist, and PIU/PIST should discuss and agree on the relevance and sequence of steps prior to their implementation.

### **1. Assess the Status of the Project**

The approach, type, and level of effort will vary depending on a project's implementation status:

- **Ongoing projects.** Ongoing projects require retrofitting to include mitigation measures. Such projects should be considered high priority for monitoring because of the existing risk of discrimination.
- **Early-stage projects.** Projects at an early stage of implementation require retrofitting to include mitigation measures, but the need for monitoring is not as urgent as for ongoing projects. The priority level for early-stage projects will depend on the status of activities on the ground and whether or not a PIU and service providers are in place.
- **Closing and closed projects.** Projects that have closed since the enactment of the AHA or that will be closing in the next six months require a due diligence review to assess if there are any outstanding complaints or issues related to the discrimination of vulnerable or marginalized individuals or groups and if any remedial measures are needed.

The results of the due diligence should be incorporated into the standard environmental and social closure review unless it has been completed already. No further action is needed.

- **Pipeline projects.** A project that has not yet begun implementation provides the opportunity to integrate AHA risk mitigation measures and monitoring into its design.

NUSAF IV as a pipeline project has presented such an opportunity to integrate these mitigation measures and monitoring into its design.

### **2. Enhance Existing Project-Level Grievance Redress Mechanisms and Establish a Hotline**



SREO will distribute a questionnaire to World Bank and PIU/PIST social development specialists to assess existing project-level GRMs. Based on a review of responses, it will recommend actions that the PIU/PIST or service providers can take to improve the GRMs.

With the support of SREO, the PIU/PIST and the social development specialist will revise the project GRMs to include effective, safe, ethical, and confidential referral pathways, ensuring that individuals or groups feel secure reporting incidents and that grievances are addressed quickly, efficiently, and appropriately.

SREO will provide training to GRM staff so they can recognize AHA-related complaints and route them to the EISM. The enhanced process will enable the PIU/PIST to identify complaints of exclusion or discrimination sent to the GRM and forward them to SREO within 48 hours of receipt.

### **Hotline on Discrimination and Exclusion**

SREO has designed and operates a hotline (0800 333125) as an alternative way to receive complaints about the exclusion or discrimination of vulnerable or marginalized individuals or groups related to accessing benefits, services, or opportunities in World Bank/IFC operations. The design of the hotline will allow it to:

- Receive complaints in a confidential, anonymous, and nonjudgmental manner that is sensitive to local context and available in local languages.
- Compile detailed monthly reports of complaints.
- Advise complainants on remedial actions.
- Map available services for vulnerable or marginalized individuals or groups, including counseling, legal services, and protection.
- Refer individuals to appropriate local services or organizations.
- Implement a data privacy and protection policy that includes confidentiality clauses which must be signed by all personnel handling referrals
- Establish a data management system that guarantees safety through secure encryption and privacy protocols.
- Develop specific security protocols to ensure communications are safe, ethical, and confidential.
- Ensure all grievance mechanisms have appropriate whistle-blower protection protocols in place that enable safe reporting.

**World Bank's Grievance Redress Service.** In addition to the enhanced project-level GRM and the dedicated hotline, the World Bank has developed a specific window under its existing Grievance Redress Service (GRS) to manage complaints related to any World Bank project globally. A protocol has been developed to process all complaints related to exclusion or discrimination in the Uganda portfolio.

### **3. Conduct Outreach and Sensitization Activities**

The World Bank team, PIUs/PISTs, and service providers should contact SREO to assist with:

- The preparation and implementation of a plan to disseminate information about existing GRMs and the dedicated hotline.
- The development and implementation of outreach activities on nondiscrimination delivered to beneficiaries and communities in a safe, ethical, and confidential manner.

#### **4. Strengthen Capacity and Deliver Technical Support**

The World Bank team, PIUs/PISTs, and service providers should contact SREO to assist with:

- Training workers, contractors, and project-level GRM staff on nondiscrimination and inclusion, including developing training materials, identifying venues, and hiring trainers.
- Delivering any other needed technical support related to the implementation of the mitigation measures.

SREO will prepare training modules for call center operators, data management personnel, and community outreach personnel on the appropriate handling of sensitive information given the AHA context.

#### **5. Conduct Monitoring and Evaluation**

Task team leaders, social development specialists, PIUs/PISTs, and service providers should contact SREO to:

- Support the monthly and quarterly monitoring and evaluation of the implementation of agreed measures and actions to mitigate the risk of exclusion and discrimination and to reduce incidents of discrimination or exclusion due to the AHA.
- Provide comments on regular evaluations of the effectiveness of mitigation measures.
- Offer feedback on recommendations and support the implementation of adjustments to mitigation measures based on their effectiveness.

#### **6. Take Remedial Action**

When a discrimination or exclusion complaint is reported to the dedicated hotline, the following process should be followed:

- SREO will report the grievance to the World Bank, propose appropriate remedial actions, and follow up on agreed actions to resolve the case.
- The World Bank's EISM coordinator and country manager will assess the complaint and then forward it to the Ministry of Finance, Planning and Economic Development. If the Ministry does not object to the World Bank's recommendations, they will be forwarded to the PIU/PIST.
- The PIU/PIST is responsible for implementing the agreed measures, which might include training and retraining, hiring, offering financial compensation, providing service referrals, taking disciplinary actions, and providing access to project services and benefits.

## **Roles and responsibilities for the Implementation of Mitigation Measures**

The different steps presented are guidance on the how to do and the sequencing for the implementation of the mitigation measures bearing in mind that the sequencing can vary from one project to another, and activities done in parallel in some instances. Each Step identifies the roles and responsibilities of the GOU, PIU/PIST, WBG, CSOs and SREO. The roles and responsibilities are summarized in this section in table 18.

This section also provides more specific information on roles and responsibilities to implement the mitigation measures of the EISM firm RSEO and the PIUs/PIST. The mitigations measures identified in the Projects' environment and social instruments will be implemented by the GOU through the PIU/PIST with the support of the EISM firm RSEO hired by the World Bank with NGO/CSOs and country-based development partners in implementing these mitigation measures. SREO's specific responsibilities include:

- Helping project teams improve existing project-level grievance redress mechanisms, and developing and operating an independent mechanism to identify, manage, and monitor cases of discrimination.
- Developing a robust data management system and process that secures personal data and information safely, ethically, and confidentially.
- Working with the World Bank to strengthen the capacity of PIUs/PISTs, workers, contractors, subcontractors, and service providers.
- Ensuring that contracts, codes of conduct, hiring procedures, whistle-blower protections, and all other needed protocols are in place to remediate cases of discrimination.
- Supporting the World Bank in monitoring the efficacy of the agreed mitigation measures.
- Reporting complaints of discrimination to the World Bank, proposing appropriate remedial actions, and following up on agreed actions to resolve cases.

With the support of SREO, PIUs/PISTs are responsible for implementing mitigation measures as described in the environmental and social instruments, including:

- Developing training, sensitization, information, educational, and communication materials on the principle of nondiscrimination of individuals or groups who are vulnerable or marginalized.
- Conducting consultations on nondiscrimination with targeted external stakeholders, including NGOs, CSOs, local governments, and other stakeholders, as appropriate.
- Integrating clauses on nondiscrimination and codes of conduct on nondiscrimination into all project contracts, which must be signed by all contractors, subcontractors, and service provider staff.
- Reviewing all relevant policy and protocol documents, including those for human resources and whistle-blower protections.
- Facilitating the monitoring of all measures to ensure their implementation, that all reported incidents are shared with the World Bank, and that they are addressed promptly.

**Table 18: Roles and Responsibilities for the Implementation of Mitigation Measures**

***Government of Uganda***

- Facilitating the implementation of mitigation measures under the leadership of the Ministry of Finance, Planning and Economic Development and through PIUs.
- Following up on reported cases of discrimination in coordination with the World Bank EISM coordinator and country manager.
- Achieving agreement with the World Bank on remedial actions and forwarding recommendations to PIUs.

***Project Implementation Units/Project Implementation Support Teams***

- Reviewing and enhancing project-level GRMs.
- Ensuring the implementation of mitigation measures.
- Facilitating capacity strengthening and community outreach efforts.
- Implementing agreed-on remedial actions and measures.

***World Bank (task team leaders, social development specialists, and the EISM coordinator)***

- Supporting capacity strengthening and training sessions.
- Facilitating communication between SREO and the Ugandan government, SREO and task team leaders, and SREO and PIUs/PISTs.
- Overseeing the remediation of reported cases, makes recommendations, and follows up to ensure their resolution.

***Civil Society Organizations***

- Hired by the EISM firm (SREO) to coordinate the monitoring of activities in Uganda.
- Participate in capacity-building and outreach activities to disseminate information about the hotline and the GRS to relevant populations.
- Receive and manage referrals for issues outside the EISM's scope.

***SREO Consulting, Ltd.***

- Establishes a dedicated hotline and assists PIUs/PISTs in improving existing GRMs.
- Conducts outreach and sensitization activities.
- Provides capacity-strengthening and technical support to PIUs/PISTs.
- Monitors and evaluates discrimination complaints.

